

Appendix E.

Public Comments and Response

Two public hearings were conducted on April 23rd and 24th 2001, between 2 and 4 p.m. in the cities of Seymour and Marion. A total of 12 non-agency participants attended the hearings, along with 11 agency representatives. In addition to the public participation in the hearings, written comments were received from citizens. Copies of these comments follow, along with the Consolidated Plan Coordinating Committee's response. The written comments reiterate the issues discussed in the hearings; thus, the oral comments are represented in the letters. The comments appear in the order in which they were received.

Responses to Public Comments

Letter No. 1. This letter has been responded to from both the U.S. Department of Housing & Urban Development (HUD) and the State of Indiana Family and Social Services Administration (FSSA). - FSSA is also in the process of continuing investigations into the situation and will respond directly to Mr. Setser.

Letter No. 2. The Emergency Shelter Grant (ESG) program provides operating funds for emergency shelters, including domestic violence shelters. The total dollar amount awarded to ESG grantees during FY2000 was \$1.65 million. Twenty-two percent of these dollars funded essential services, 66 percent operations and 12 percent homeless prevention activities. If the Consolidated Plan is approved, the state will receive \$1.7 million in ESG funding for FY2001.

The Committee recognizes that this level of funding does not fully meet the needs of the state's emergency shelters. However, regulations do not allow the state to use funds from other housing grant programs (CDBG and HOME) to support shelter operations (although these funds can be used for shelter rehabilitation and new construction). The Committee is supportive of your efforts to seek additional sources of funding for operations and offers its assistance to shelters working to obtain such funds.

Letter No. 3. This email was responded to by the consultants during the course of the Citizen Participation Process; response emails are attached.

Letter No. 4. The Committee understands the need for grants to assist organizations with development planning. The Committee also recognizes that the grants fall short in covering costs associated with community development projects. For FY2001, the Committee has decided to keep the grants at their current levels. Although doubling the grants would provide a greater amount of assistance to each project, the dollars would be allocated to fewer projects. The Committee has, however, increased the amount that it intends to allocate to planning grants in FY2001. For this program year, the planning grant component of CDBG funding will be allocated \$1.6 million -- \$300,000 more than what was funded in FY2000. In addition, in the event that IDOC receives CDBG Program Income, such monies will be placed in the Planning Fund for the purpose of making additional competitive grants under that program.

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Letter No. 5. The Committee thanks you for your comments about your Section 8 payments. We have forwarded your letter to the local HUD office in Indianapolis and requested that they share your concerns with the national HUD division that administers Section 8. We encourage you to contact your local Area Agency on Aging (AAA), which may offer advocacy services. To reach your local AAA, call 1-800-986-3505.

Letter No. 6. The Committee appreciates your input on the structure of the regional forums and will take them into account when designing next year's citizen participation process. The Committee will also keep in mind your innovative thoughts on the relationship between the HUD grant administrators (the "headquarters") and grantee recipients ("branch offices").

The Committee recognizes the important role that not-for-profits play in assisting special needs and low income populations in the State. The Committee has included as one of its five year goals enhancing the local capacity for housing and community development. During FY2000, the Indiana Department of Commerce helped fund a study to establish a strategic plan and identify system resources to support nonprofits on a statewide level. The Committee intends to use the findings from this study to support capacity building efforts in future program years.

Letter No. 7. The Committee appreciates your specific ideas about how to increase the housing and employment opportunities for persons with disabilities. The Committee recognizes that persons with disabilities face great challenges in finding decent, affordable housing and well-paying jobs. This year the Committee made a special effort to receive input from persons with disabilities by holding six regional forums specifically targeting such persons. The Committee also has as one of its five year goals to strengthen the safety net of housing and services for special needs groups, including persons with disabilities. To this end, the Committee is taking the following steps to increase housing and employment opportunities for persons with disabilities:

- Continue using IHFA's Housing from Shelters to Homeownership program for owner-occupied grant rehabilitation that can be used for home improvements that accommodate people with physical and developmental disabilities and the elderly. During the program year 1999, 20 percent of HOME and CDBG awards made by IHFA were for owner-occupied housing, many of which were targeted to one or more special needs groups.
- Explore the feasibility of a pilot home modification loan program that could also be used for physical adaptability. Currently, IHFA is trying to fit the program into the existing structure of its bonds. IHFA staff recently visited a group in Fort Wayne that administers an owner-occupied home modification program. It is hopeful that IHFA will be able to implement this program in 2002-2004.

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- Explore the HomeChoice program sponsored by Fannie Mae that allows more flexible underwriting guidelines for homeownership. Fannie Mae recently approved IHFA's proposed HomeChoice program. During the pilot phase, HomeChoice will be offered in three counties: Bartholomew, Knox, and Marion. IHFA has earmarked \$1 million in revenues to finance the HomeChoice mortgages. If the program is successful, IHFA and its HomeChoice partners – Fannie Mae, Irwin Mortgage, and the Back Home in Indiana Alliance – will consider broadening the program throughout the state.
- Research the need for a central and comprehensive information source of programs to assist the state's citizens, especially those with special needs. The Committee included a question on the 2001 community survey that asked about the need for a statewide information source. Eighty percent of respondents said that a resource guide that lists the services available is needed. The type of service guide most favored was a paper handbook, followed by a help phone line, and finally, an Internet based guide and search tool. The Committee also researched if there is such a resource currently available and discovered that the Indiana 211 Partnership is implementing a statewide, telephone based information and referral system for citizen social service needs. The Committee will monitor the implementation of the 211 system and continue to evaluate the need for an alternative source of information.
- Use CDBG funds to support basic skills training that could be used for persons with disabilities. During FY2001, IDOC plans to set aside \$2 million for new and basic skill training. This training will be targeted at those needing basic skills (including ESL).

Thank you also for enclosing information about the recent HUD ruling that will allow Section 8 vouchers to be used for homeownership. The program is available to public housing authorities that operate a Housing Choice voucher program as defined by HUD. IHFA is not a public housing authority, and therefore cannot apply to participate in the program. However, the Committee will communicate this option to the state's public housing authorities and citizens during future citizen participation processes.

Finally, the Committee will consider your suggestion to conduct a survey targeted to persons with disabilities during the planning process for the FY2002 Consolidated Plan. The Committee will also continue to keep your comments in mind during future fund allocation and strategy and action setting processes of Consolidated Planning.

Letter No. 8. The Committee thanks you for your comments about the HOPWA and ESG programs. We understand that the funding available for emergency shelters and HIV/AIDS supportive services does not adequately meet the needs of persons who are homeless and/or living with HIV/AIDS. However, regulations do not allow the state to use funds from other housing grant programs (CDBG and HOME) to support shelter operations (although these funds can be used for

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shelter rehabilitation and new construction). The Committee encourages you to continue your advocacy efforts at the national level. The Committee has forwarded your letter to the local HUD office in Indianapolis and requested that they share your concerns with the national HUD division that administers HOPWA.

Letter Nos. 9 and 10. These comments are specific to the rental housing assistance policies of the Indiana Housing Finance Authority and were responded to directly from IHFA.

Letter No. 11. The Committee thanks you for your comments about the grant application process and funding prioritization. You raised some interesting ideas about how to more efficiently distribute housing and community development funding to cities throughout the state through a geographic allocation of funds. One of the Consolidated Plan Committee's primary goals is to allocate funds to where they are most needed. Since housing and community development needs are not equally distributed, a broad geographic allocation could result in funds being directed away from their best use. Furthermore, the Committee is required to demonstrate that funds have been used within the guidelines of Federal regulations, which necessitates some type of application process.

We agree that lack of knowledge about programs can lead to needs being unmet. To mitigate this, the Committee makes a concerted effort each year to educate communities about the funds available and assist them in applying for such funding. In addition to hosting grant application training sessions, sponsoring technical assistance, and engaging the public in the planning process, the HUD grantee agencies have specialists assigned to regions of the state; it is their duty to assist each area in applying for available funding.

The Committee will take your comments into consideration during future planning sessions.

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Letter No. 1

SENATOR TIM SANDERS
COATS
REPUBLICAN

COST OF LIVING, PARK ANTENNA, HUD TALKING TO VICE PRES, WHY HAVENT
THEY DONE ANY THING BEFORE, FIXED INCOME, CHILD, CABLEBILL,
TRUSTEE, SALVATION, WROTE CLINTON, SOMEONE ALREADY RECIEVE HUD,
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Don't like it
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OFFICE OF THE ASSISTANT SECRETARY
FOR HOUSING-FEDERAL HOUSING COMMISSIONER

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-8000

DEC 12 2000

Mr. Henry C. Setser
40 Colonial Avenue
Valparaiso, IN 46383

Dear Mr. Setser:

President Clinton has received your letter of October 30, 2000, requesting rental assistance toward your mobile home lot rent. He has asked the Department of Housing and Urban Development (HUD) to respond to you directly since it administers most housing programs.

Currently, Congress has not adopted a statute which would give HUD the authority to assist individuals with their mobile home park lot rent. However, there are housing counseling agencies nationwide that provide information on low-income housing programs that are offered by Federal, State, and local governments. Please find enclosed a listing of housing counseling agencies for the State of Indiana which should be of assistance to you.

I hope this information is helpful.

Sincerely,

A handwritten signature in cursive script that reads "Willie Spearmon".

Willie Spearmon
Director
Office of Housing Assistance
and Grant Administration

Enclosure

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212-975-2006
212 975 3247
60 MIN
68 MIN

INDIANA FAMILY & SOCIAL SERVICES
ADMINISTRATION
"People helping people help themselves"

Frank O'Bannon, Governor
State of Indiana

Division of Family and Children
Housing and Community Services Section
MS 01, 402 W. WASHINGTON STREET, P.O. BOX 6116
INDIANAPOLIS, IN 46206-6116

317 261 529 W 57TH ST
7059 Berson
317 327 8100 / 261 1010
Johanna 7233
Berson
COUNTY
COMMISSION

December 14, 2000

Henry C. Setser
40 Colonial Avenue
Valparaiso, IN

Dear Mr. Setser
226 6363-4

Your letter to President Clinton has been referred, through the Department of Health and Human Services, to the Division of Family and Children (DFC). The DFC administers the Energy Assistance Program and the HUD Section 8 program in areas where there is no local housing authority.

Tom Reel, Assistant Manager of the Housing and Community Services Section contacted you by phone. You have applied for Energy Assistance again this year. As Mr. Reel discussed with you, this agency administers the Section 8 Housing program through a subcontract with LCEOC, Inc. The waiting list for Porter County Section 8 is currently closed, due to the number of persons on the list. However, you may want to check occasionally to see when the list reopens. You may do so by calling:

LCEOC, Inc. - Porter County Office
1005 Campbell
Valparaiso, IN 46383
(219) 464-9736

Or, you may call Housing and Community Services, Section 8 toll free, at (800) 622-4973. Pre-applications are taken at that number on Tuesdays and Thursdays, from 8:30 AM to 4:00 PM.

If there are further questions please call Tom Reel, Assistant Manager, Housing and Community Services, at (800) 622-4973, extension -7098.

Office of Governor
State House
RM 206
INDY INH
46204

Sincerely,
James H Hmurovich, Director
Division of Family and Children

cc: Governor Frank O'Bannon
2000 EAP Inquiries File
Grantee File: EAP/LCEOC/00

Equal Opportunity / Affirmative Action Employer

317 232 4557

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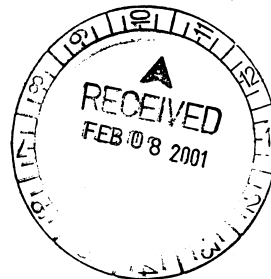
Public Comments and Response

Letter No. 2



Administrative: (765) 643-0218
Crisis: (765) 643-0200
Fax: (765) 643-0291
E-Mail: aimc@iquest.net

February 7, 2001



Consolidated Plan
Indiana Department of Commerce
Controller's Office, Grants Management Division
One North Capitol Avenue, Suite 700
Indianapolis IN 46204-2248

To Whom It May Concern:

Thank you for the opportunity to provide information for Indiana's Consolidated Plan. As Executive Director of Alternatives Incorporated of Madison County, an emergency shelter for women and children who are homeless and/or survivors of domestic violence, I would like to encourage an expansion of the funds available for general operating costs for emergency shelters.

Emergency shelters are the initial and critical step in Indiana's continuum of care. We are expected to be "ready, willing and able" to accept families in crisis. Although we are very appreciative of the Emergency Shelter Grant Program, the level of funding is clearly not adequate to meet the needs. Most of the shelters in Indiana are simply surviving like the families we are serving. The shelters are understaffed and under maintained.

Helping families break the cycles of welfare dependency and domestic violence requires comprehensive programming. I urge you to help those of us operating emergency shelters to be more effective by assisting us in securing adequate funding.

Thank you for your concern for Indiana's families and children.

Sincerely,

Mary Jo Lee
Mary Jo Lee
Executive Director

cc: John Beeson

Beryl Cohen

Program funded by: Indiana Family and Social Services Administration, Indiana Criminal Justice Institute, U.S. Department of Housing and Urban Development, Indiana Department of Commerce, Indiana Department of Education, United Way of Madison County, United Way of Central Indiana, Indiana Children's Trust Fund, Madison County Office of Family and Children, Community Hospital Anderson, City of Anderson Community Development, Federal Emergency Management Agency, Anderson Community School Corporation, Madison County Community Foundation, Chemical People Task Force of Madison County, Indiana CARE Initiative, Target Partnership, City of Anderson Urban Enterprise Association, program fees, and contributions.

Equal Opportunity/Affirmative Action Employer

Appendix E.

Public Comments and Response

Letter No. 3

From: Mary Melkus [bunny@ligtel.com]
Sent: Monday, February 19, 2001 8:52 AM
To: aggeler@bbcresearch.com
Subject: Public Heraing Details letter

I was pleased to have received your letter about the public hearing, but very disgusted that you would send a letter to visually impaired or handicapped people in standard print. Is it your intention to advise the visually impaired or do you hope that since I cannot read this , that I would just throw it away? In my case I am blessed to have a Jordy and a husband who will read this to me. How many others are that blessed? Do you take this into consideration? It may take an extra sheet of paper for larger print to be sent, but if that extra sheet is an expense issue, then I would respectfully ask that it be a consideration of the usage of funds. As for transportation, I live in Kendallville and my husband works days , so I have no way to attend. Why can't the League make arrangements with the Council of Aging in surrounding counties to provide transportation to those who have no means in which to attend a meeting that is very important to all of us that are handicapped? I know you cannot move mountains, but if I and others like myself are to believe you are working for us, then please address these issues!

Sincerely

Mary
bunny@ligtel.com
Callwave Activated - Leave Message

Appendix E.

Public Comments and Response

From: Aggeler, Heidi
Sent: Monday, February 19, 2001 10:35 AM
To: 'Mary Melkus'
Subject: RE: Public Hearing Details letter

Dear Ms. Melkus;

Thank you for your message concerning the announcement of public hearings for the State of Indiana's FY2001 Consolidated Plan.

The goal of the letter that you received is to announce the regional forums and public hearings to local officials, community leaders, social service providers, and advocates, including those for the visually impaired. While we organize and facilitate the meetings, we count on advocates and social service providers to get the word out to their clients. Since we distribute thousands of letters throughout the State, we need the assistance of advocacy organizations to communicate the information to their clients. For individuals who are visually impaired, this might mean designing an announcement in large print or calling clients to encourage their participation.

The locations of the forums are rotated each year. Last year we held a forum in Kendallville, which is why we are not visiting the town this year. In the past, transportation to the forums has not been a statewide concern and has been handled at the local level (for example, some communities have rented school buses to bring citizens to forums). We will take your idea into consideration and see what we can do to facilitate transportation to the forums in the future.

Attending the forums is not the only way that your concerns can be heard. Sending the Consolidated Plan Committee written comments or a voicemail can be very effective, because you can provide more detailed comments about your community's needs and include suggestions for how to meet those needs. We review all of the written and spoken comments that we receive and document the concerns by including them in the Consolidated Plan report (which is reviewed by the U.S. Department of Housing and Urban Development, who funds the state housing and community development programs).

Please be assured that we will take your comments into account when we distribute materials and plan the locations of the forums and public hearings in the future.

I would also encourage you to email me, send me a letter, or call me at 1-800-748-3222, x256 and share your knowledge about your community's needs, particularly those of the visually impaired.

Thank you again for your comments, and I look forward to hearing from you again.

Heidi Aggeler

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From: Aggeler, Heidi
Sent: Monday, February 19, 2001 11:41 AM
To: 'Mary Melkus'
Cc: 'Linda Keys, Keys Group'
Subject: RE: Public Heraing Details letter

Ms. Melkus;

I have also forwarded your message to Dr. Linda Keys, who is coordinating the regional forums. In addition to the forums, Dr. Keys has scheduled meetings with advocacy groups throughout the state to learn about the housing and community development concerns of the disabled. She would be happy to talk with you by phone also.

-----Original Message-----

From: Mary Melkus [mailto:bunny@ligtel.com]
Sent: Monday, February 19, 2001 8:52 AM
To: aggeler@bbcresearch.com
Subject: Public Heraing Details letter

I was pleased to have received your letter about the public hearing, but very disgusted that you would send a letter to visually impaired or handicapped people in standard print. Is it your intention to advise the visually impaired or do you hope that since I cannot read this , that I would just throw it away? In my case I am blessed to have a Jordy and a husband who will read this to me. How many others are that blessed? Do you take this into consideration? It may take an extra sheet of paper for larger print to be sent, but if that extra sheet is an expense issue, then I would respectfully ask that it be a consideration of the usage of funds. As for transportation, I live in Kendallville and my husband works days , so I have no way to attend. Why can't the League make arrangements with the Council of Aging in surrounding counties to provide transportation to those who have no means in which to attend a meeting that is very important to all of us that are handicapped? I know you cannot move mountains, but if I and others like myself are to believe you are working for us, then please address these issues!

Sincerely

Mary
bunny@ligtel.com
Callwave Activated - Leave Message

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Public Comments and Response

Letter No. 4

Your Voice Builds Communities - Community Development Block Grants
Planning Grant Funding – Increase Amounts for Large Projects
Sharing on March 1, 2001 in Crawfordsville, Indiana

Good Afternoon.

My name is Don Morrison, I'm a State of Indiana Certified Community Development Block Grant Administrator and Grant Writer under contract to Tippecanoe County. I have given the recording secretary a written copy of my presentation.

I appear before you this afternoon to share with you the need to continue funding for planning grants. Planning grants are essential for the preliminaries or first steps to future community facilities such as youth centers. The present Planning Grants for Funds from the Community Focus Fund as administered by the Indiana Department of Commerce, Community Development Division are appreciated although barely adequate.

I would like to explain why these are barely adequate. I would like to share with you about large projects. The Grant limits of \$50,000 for the larger projects is usually too low. If awarded I think this how these may be spent. Currently, \$43,000 may be used for planning such as financing, permitting, and site control or site acquisition activities. \$43,000 is large sum but

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Your Voice Builds Communities - Community Development Block Grants
Planning Grant Funding – Increase Amounts for Large Projects
Sharing on March 1, 2001 in Crawfordsville, Indiana

sometimes doesn't really approach covering the planning costs for large projects. Since I am not a recipient or planned recipient of these funds, I can impartially say I would like to see this increased to \$86,000.

Typically, an additional \$3,000 would be allocated for any needed environmental assessments, this needs to be revised and increased to \$6,000. There are more environmental requirements to meet today than previously. To do more costs more.

A final portion, and \$4,000 is suggested, would be for administration. I know the Community Planning Division does NOT originate the documentation that is required, but either this paperwork should be reduced or the administration amount suggested should be increased to reflect the true costs of processing. Say \$8,000.

Recapping. The \$50,000 would immediately increased to \$100,000 be used for large projects for:

- finding financing for building,
- preliminary engineering, architectural and other planning.

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Your Voice Builds Communities - Community Development Block Grants
Planning Grant Funding – Increase Amounts for Large Projects
Sharing on March 1, 2001 in Crawfordsville, Indiana

- site reviews, control and or acquisition,
- any needed environmental assessments, and
- acquiring the various permits.

I would be pleased to answer any questions you may have.

Thank you for this opportunity.

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Letter No. 5

564 Sienna Avenue
Oak Tree Village
Portage, IN 46368-2557
219-762-8922

HUD Agencies Hearing, Valparaiso, IN:

For several years HUD Sec. 8 has been paying most of my mobile home lot rent. I own it and a small '92 car, total proceeds of a 46 year marriage and my husband's 1995 divorce. Neither he or five adult children give me any financial help. My total Social Security income at his divorce was \$346!! Today I receive \$530 from Social Security and Supplemental Security. At age 74, due to health reasons, I can longer work part-time, as I did about 3 years!!

Since January 1 I've paid \$73 as my share of lot rent. Recently the lady who figures the contracts stated that starting April 1 my share will be \$222-that's 42 % of my total income!!! My monthly rent, including water, sewer, trash pick-up is \$329. I understand that HUD pays much more for folks who live in rented mobile homes, as their costs are much higher. I feel I'm being punished for owning my home and several years of paying taxes on it.

My other welfare services are Medicaid and food stamps; also have to go to food pantry. This year's energy assistance allotment is \$303-how far will that go with energy costs?? No form of welfare pays home and auto insurances and maintenance, appliance and clothing replacements, and other miscellaneous needs.

Many old women like me have been productive members of society for decades. We've cared for husbands and children, were involved in PTA, youth sports, church, political and other community activism. Then in our old age, through no fault of our own, we become impoverished!!

Today I have with me a nationally syndicated column, published locally January 1, 2001. It refers to the new HUD Secretary's appointment and goals. "....maintaining all of today's Section 8 contracts.." A reasonable person assumes maintaining contracts wouldn't include TRIPLING the amount they expect me and other poor old people to pay.

My pleas aren't just for myself, but at least one of my neighbors and GOD knows how many other aged people caught in drastic circumstances. Everyone I've dealt with in the welfare system agrees that it's so unfair to senior citizens who have contributed much to our society.

How can it be that some families are in their/^{third}generation of receiving welfare benefits? But someone like me has to complain and give testimony to fight injustice.

Thank you for considering my testimony.

Sincerely,

Mary Dick
Mary Fick

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Public Comments and Response

Letter No. 6

From: Sheryl Sharpe [ssharp@ihfa.state.in.us]
Sent: Monday, March 19, 2001 8:44 AM
To: Michelle Kincaid; Heidi Aggeler (E-mail); Linda Keys (E-mail); IDOC - Kelly Boe (E-mail); IDOC - Chuck Martindale (E-mail)
Subject: FW: [WWW] Consolidated Plan 2001

-----Original Message-----

From: Nicholas Murphy
Sent: Monday, March 19, 2001 8:33 AM
To: Sheryl Sharpe
Subject: FW: [WWW] Consolidated Plan 2001

-----Original Message-----

From: Mark Lindenlaub [mailto:mlindenlaub@hotmail.com]
Sent: Friday, March 16, 2001 4:44 PM
To: namurphy@ihfa.state.in.us
Subject: [WWW] Consolidated Plan 2001

subject: Consolidated Plan 2001
Name: Mark Lindenlaub
Organization: Housing Partnerships, Inc.
Email: mlindenlaub@hotmail.com
Comments:
Hello IHFA Staff,

I attended the 3/12 regional meeting, and wanted to follow up with a few written comments.

I don't feel it was realistic in 45 minutes to re-work the agency budgets. I was the most knowledgeable in my group on the programs, but I still felt many of our decisions were arbitrary--we added money where we thought priorities were higher (but not necessarily the "correct" amount) and took away from programs that had the "biggest target" budgets. We had good priorities, I think, but not very good details in how they'd affect the budgets.

Beyond this, my group felt there were some strong priorities we didn't discuss as a large group that were not being given financial support.

First, unless you think our budgets will magically double, we need to work smarter to be more effective. In particular, we need to focus on FAMILIES at the core of our service offerings, and we need housing (and all other) programs to work together to meet ALL the needs of the families. If they get help with housing, childcare, and food, but lack reliable transportation to get to and from work, the entire plan falls apart. It's like building 90% of the bridge and hoping that's good enough for them to make it the last little bit. Could IHFA/Commerce devote a small % of their money to very

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flexibly
meet needs within "mix-and-match" programs that local organizations
put together to meet comprehensive family needs?

Second, IHFA and Commerce need to begin thinking of themselves and the
headquarters of affordable housing in the state, with local organizations
as
the branch offices. Now think about running your corporation--How much
product do you want to deliver? How many branch offices does it take to
deliver that much product? How many branch offices can you afford to
support? Where are your most successful offices, and what are you doing
to
try to replicate their success? What's going on in some offices that you
need to make sure doesn't happen elsewhere?

One thing to keep in mind is that a number of CHDO's and CDC's
have sprung up
in the last few years, and as we "mature" as a group, different issues
and
potential problems become more critical. What can we do to make sure we
don't have a bunch of organizations across the state implode financially?

Finally, NFP's are working under "profit" guidelines that
are substantially
below the open market, yet we typically do the more difficult
"profitless"
projects that the community needs, but nobody else is willing to touch.
Organizations should be recognized for their role in community
development
activities by providing them with a reasonable income stream from their
affordable housing activities.

Thanks for your strong emphasis on public input on your programs.
I certainly feel that you have open ears and an open mind to hear what we
have
to say.

If you have any questions about my comments, please contact me.

Mark

B1: Submit

Appendix E.

Public Comments and Response

Letter No. 7



The Indiana Governor's Planning Council for People with Disabilities

March 21, 2001

Ms. Kelly Boe
Indiana Department of Commerce
1 North Capitol
Indianapolis, IN 46204



The Governor's Planning Council for People with Disabilities commends the Department of Commerce, Housing Finance Authority, and the other Con Plan Partners for making a concerted effort to include the participation of people with disabilities in the development of the Consolidated Plan.

The plan has the capacity to have a major positive impact on the lives of people with disabilities. This plan will define how people with disabilities are viewed and ultimately served in their respective communities.

The Governor's Planning Council for People with Disabilities strongly supports efforts to increase housing options available to people with disabilities in regular neighborhood and communities. These options must provide people with disabilities, with choices as to with whom and where they live.

Employment is an essential part of everyone's life, regardless of a disability. Having capital not only defines where one lives and how one lives but how one relates to others. Therefore, resources must be channeled to increase the number of persons with disabilities placed in competitive employment and being paid livable wages. People with disabilities can then take their rightful place among a diverse workforce which can compete in the global economy.

We offer the following recommendations related to how Indiana's Consolidated Plan could play a positive role in ensuring that individuals with disabilities, who currently live in inappropriate settings and in poverty in their communities, get better access to the decent, safe, affordable, and accessible housing that they need as well as to employment and community supports.

1. Apply for Section 8 vouchers targeted for people with disabilities including people receiving Medicaid Home and Community Based Waiver services.
2. Develop home ownership options targeted to low income people with disabilities and families. HFA should take full advantage of the resources and assistance available through the National Home of Your Own Alliance and Indiana's Back Home in Indiana Alliance.

Achieving independence, productivity and inclusion

143 West Market Street, Suite 404 • Indianapolis, Indiana 46204-2821 • (317) 232-7770 Voice • 232-7771 TT
• 233-3712 Fax • gpcpd@in.net • www.state.in.us/gpcpd

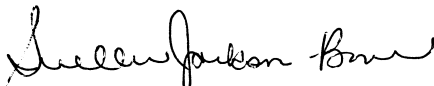
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3. Apply to HUD for the new Section 8 Voucher Home Ownership Program to allow people a choice between rental subsidies and mortgage supplements (see attached information from the National Home of Your Own Alliance)
4. Develop accessible housing alternatives for people with disabilities that are dispersed throughout the community rather than congregate settings. Include single family options.
5. Initiate home modification programs for physical and technological adaptations.
6. Target Indiana Department of Commerce funding to support the development of inclusive employment opportunities for people with disabilities in typical community jobs.
7. Initiate a program to encouraged all new housing stock to use "universal design".
8. Explore ways to improve community supports and access so that individuals with disabilities of all ages can continue to live and work in their home communities.
9. For the 2002 plan update, conduct a targeted survey of people with disabilities and family members to determine specific housing and economic development needs.

We were pleased to offer the Council's assistance this year in getting information out to the disability community about this critical opportunity and look forward to working with you again on future years efforts.

Sincerely,



Suellen Jackson-Boner
Executive Director

Appendix E.

Public Comments and Response

Section 8 Voucher Program for Homeownership

On Tuesday, September 12, 2000 HUD released the final rule that will allow individuals and families to use Section 8 Vouchers for Homeownership.

The use of Section 8 vouchers for homeownership will give many Americans who have low incomes the opportunity to purchase their own homes. In addition, the use of Section 8 vouchers for homeownership will provide many new opportunities for people to contribute to their local economy. Homeownership will allow individuals and families to obtain loans from their local banks, hire members of their communities to perform maintenance and repair work on their homes, and pay property taxes that contribute to the purchase of local services enjoyed by community members. Homeowners express a feeling of greater safety, security, and belonging in their communities.

- Public Housing Authorities (PHAs) that choose to participate in the Homeownership Program can:
 - 1) Allow eligible individuals and families to convert current Section 8 vouchers from rental supplements to mortgage supplements, and
 - 2) Allow future eligible individuals and families to choose between mortgage subsidies and rental subsidies.

HUD anticipates that mortgage lenders will consider the Section 8 assistance when underwriting a loan.

The homeownership option will assist families in two types of housing:

- 1) A unit owned by the family--One or more family members hold title to the home.
- 2) A cooperative unit--One or more family members hold membership shares in the cooperative.

The final rule on homeownership released by HUD includes provisions that:

- 1) One or more adult members of the family need to be employed at time of commencement of assistance for at least 30 hours per week. The employment requirement does not apply to an elderly family or a disabled family. Furthermore, if a family, other than an elderly family or a disabled family, includes a person with disabilities, the PHA must grant an exemption from the employment requirement if the PHA determines that an exemption is needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.
- 2) A national minimum (gross) income requirement (of adult family at time of commencement) that is equal to 2,000 hours of annual full-time work at the Federal

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Public Comments and Response

minimum wage. The PHA must count welfare assistance of an elderly or disabled family in determining whether the family meets the minimum income requirement for homeownership assistance. (Welfare assistance is defined as: "Welfare or other payments to families or individuals, based on need, that are made under programs funded, separately or jointly, by Federal, State or local governments." 24 CFR 5.603)

- 3) It is possible to switch from Section 8 homeownership voucher assistance to rental voucher assistance, and vice-versa, after a mortgage default and at other times.
- 4) A family determined eligible for homeownership assistance by the initial PHA may purchase a unit outside of the initial PHA's jurisdiction, if the receiving PHA is administering a voucher homeownership program and is accepting new homeownership families.
- 5) A homeownership family may purchase another home with Section 8 assistance provided there is no mortgage loan default. The family must sell its current home in order to purchase another with homeownership assistance.
- 6) PHAs will recapture a percentage of homeownership assistance defined in the regulations upon the sale or refinancing of the home. Sales proceeds that are used by the family to purchase a new home with Section 8 homeownership assistance are not subject to recapture.
- 7) A family may refinance their home to take advantage of lower interest rates, or better mortgage terms, without any recapture penalty. Only those proceeds realized upon refinancing that are retained by the family (for example during a "cash-out" of the refinanced debt) are subject to the program recapture provision.
- 8) Two kinds of physical inspections are required (in addition to, and separate from, any lender required inspections): an HQS inspection by the PHA and an independent professional home inspection by an inspector used in the private market by homebuyers.
- 9) Section 8 homeownership assistance can be used for a family that purchases a home that the family previously occupied under a "lease-purchase agreement" --generally a lease with option to purchase.
- 10) The family attend homeownership counseling sessions.
- 11) The family enter into a contract of sale with the seller and that the family secures its own financing for the home purchase.
- 12) Homeownership housing assistance payments may be made directly to the family or to lender on behalf of the family.

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- 13) At least one percent of the purchase price comes from the family's personal resources.
- 14) A mandatory term limit on homeownership assistance of 15 years if the initial mortgage incurred to finance purchase of the home has a term that is 20 years or longer. In all other cases, the maximum term of homeownership assistance is 10 years. The PHA may not establish shorter or longer maximum terms. The final rule provides that the maximum term limit does not apply to elderly or disabled families.
- 15) If a member of the family is a person with disabilities, eligible homeownership expenses may include debt incurred to finance costs needed to make the home accessible for the family member, if the PHA determines that the allowance is needed as a reasonable accommodation.
- 16) If the home is a cooperative or condominium unit, homeownership expenses may include cooperative or condominium operating charges or maintenance fees assessed by the condominium or cooperative homeowner association.
- 17) The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and useable by persons with disabilities
- 18) The additional requirements for continuation of homeownership assistance established by the PHA may include a requirement for post-purchase homeownership counseling or for periodic unit inspections while the family is receiving homeownership assistance.

A complete copy of the new Section 8 Homeownership Rule can be viewed and downloaded in both text and PDF formats from the National Home of Your Own Alliance website at: <<http://alliance.unh.edu/>>

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Public Comments and Response

Letter No. 8

Heidi:

Thanks for sending me that information.
As per request, here is my input from what I've heard, along
with my feelings on the issues at hand...

1. There is NOT enough low income housing.
2. The governments' definition of low income differs from the people who are really living "low income".
3. Housing is difficult to obtain, especially quality housing ESPECIALLY at affordable costs.
4. Shelters for the homeless are a wonderful thing, however, there needs to be more that are secular and non-religious so those the "church" finds "not worthy" or "not acceptable" can get help.
5. HOPWA is extremely underfunded. HIV/AIDS is still a crisis and still increasing in numbers, yet the increases available for assistance are appallingly low. (I will be speaking to legislators in DC on this issue for certain)
6. There needs to be some sort of "emergency" assistance available for the homeless or those about to be homeless, and it needs to be readily accessible to those who are in need. "Emergency assistance" for the homeless or those about to be homeless is not helpful when it comes 2, 3 weeks or 1-2 months after it's been asked for...pending homelessness needs to be addressed.
7. Housing discrimination concerns me.

'Throwing more money' at a problem doesn't always solve the problem, but sometimes more money needs to be thrown. HOPWA is an extremely important service to those with HIV/AIDS. HIV/AIDS is a poverty causing illness. The other concern I have about HOPWA is that it is a short-term program. I would like to see HOPWA ideally to run as HUD section 8 does, but for the HIV diagnosis. HOPWA helps with some emergency needs that HUD does not, however, it's a short term help. Then someone like myself on HUD cannot access the special help that comes with HOPWA, but wouldn't refer to HOPWA because it is not longer term like section 8 is... This definitely needs to be addressed.

I don't know what it would take for the government to realize the true "low income" is...perhaps they should all have to live on the thoroughly unacceptable government definition of it for a year then they would see. However, I am considered the high end of low-income, yet I barely survive with my three children, and my income is minimal. The standards are out-dated and need revision.

I hope these comments help, if I think of more I will definitely get back with you before the deadline. If there is anything I do to help or make a difference, please advise.

4/30/2001

Appendix E.

Public Comments and Response

Letter No. 9



P.O. Box 336 - 302 Main Street
Tell City, Indiana 47586-0336
Tel (812) 547-3435 • Fax (812) 547-3466
TDD (800) 743-3333



April 3, 2001

Kimberly A. Green
Indiana Housing Finance Authority
115 West Washington Street
Suite 1350, South Tower
Indianapolis, IN 46204-3413

RE: Comments on Consolidated Plan

Dear Ms. Green:

We have some concern about the policy of the State which requires 100% of the HOME assisted rental units being restricted for individuals at or below 60% of area median income. That is more restrictive than the FEDERAL HOME REGULATIONS, which allow up to 10% of the units be used to assist individuals at or below the 80% of area median income.

We believe the policy needs to be changed to allow agencies and organizations at the local level to have the option to rent HOME assisted units to households up to 80% of the AMI consistent with federal regulations.

If agencies that are located in an entitlement area have that option under federal regulations why can't agencies that are located in the non-entitlement areas have that option?

We believe that there are numerous situations in which elderly or disabled households have incomes between 60% and 80% of the AMI yet have medical expenses that if considered would reduce their income below 60% of the AMI. Currently we cannot consider these applications for HOME assisted units, yet their need for affordable housing because of their medical condition may in fact be greater than those households with lower incomes.

We hope you will consider revising the Consolidated Plan to allow agencies this local option.

Thanks for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry K. Kleeman".

Larry K. Kleeman
Executive Director



A Community Action Agency



Appendix E.

Public Comments and Response



May 7, 2001

Mr. Larry K. Kleeman
Executive Director
Lincoln Hills Development Corp.
P.O. Box 336, 302 Main Street
Tell City, IN 47586-0336

Dear Mr. Kleeman:

Thank you for your letter of April 3, 2001. I will forward your comments on to the Consolidated Plan committee for inclusion in this year's report.

We have decided not to change our policy at this time for rental housing assisted through the HOME Investment Partnerships Program (HOME). Tenants are limited to 60% of the area median income. However, applicants for HOME funds may propose to structure a rental development to include both HOME-assisted and non-assisted units. Non-assisted units are considered market-rate, and the Indiana Housing Finance Authority (IHFA) does not restrict rents or set income limits for these units. Additionally, funding is available to rehabilitate units for persons up to 80% of the area median income through the Community Development Block Grant (CDBG) program.

We will continue to consider your comments as we work to develop our 2002 application packages. Next spring, we will hold our public meetings regarding revisions to the application package in conjunction with the public meetings for the Consolidated Plan. Please feel free to share your comments or concerns regarding this policy again at that time.

Thank you again for your comments.

Sincerely,

Sheryl M. Sharpe
Development Manager

cc: Kimberly Green, Executive Director
File



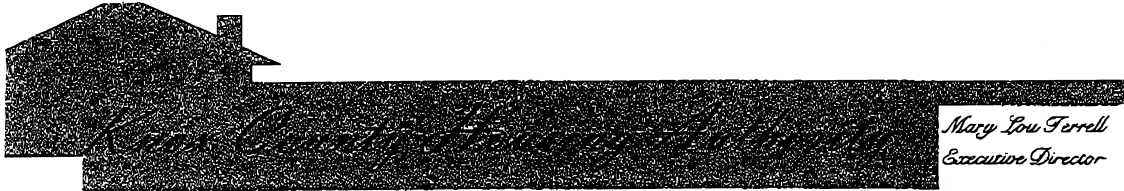
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Appendix E.

Public Comments and Response

Letter No. 10



11 Powell Street
Tilly Estate Office
Richnell, Indiana 47512

Mary Lou Ferrell
Executive Director

812-882-0220
812-735-2006
812-735-2004 fax

March 28, 2001

Indiana Housing Finance Authority
115 West Washington Street, Suite 1350
South Tower
Indianapolis, In 46204-3413

Att: Kimberly A. Green

Dear Ms. Green:

Thank you for your letter of March 20, 2001 and I enjoyed attending the Consolidated Plan public meeting in Washington, Indiana on March 5, 2001.

However, I still have some concern about the policy of the State which requires 100 percent of the rental units assisted with Home dollars be reserved for individuals at or below 60 percent of area median income. That is more restrictive than the HOME REGULATIONS, which allows up to 10 percent of the units be used to assist individuals at or below the 80 percent of area median income. You stated that the Community Development staff had indicated that not many requests to change the policy were received. However, if the policy was changed and if those persons do not need it, then it could be there for those few persons that does need it.

What needs to be taken into consideration is the fact of those that need it because of high medical bills and are in that small percentage of the 70 and 80 percent area median income. There is nothing out there for those persons. When you hear about discriminating and then, what is being done to keep us from discriminating against those families that are in that percentage over the 60 percent. And take into consideration that we are only considering 10 percent of the units. For those that don't need it then why would you not want to include it in your policy for those that do need it.

Being in rural and small community area in which persons know each other on a more personal basis does cause additional problems. Trying to explain to this little old lady that has an income of a small amount over the 60 percent, but yet we can not rent them a unit. You might say what about the lady who might have a small percent over the 80 percent income. I can tell you that we have never had to deal with someone over the 80 percent wanting a rental unit. The 10 percent of units being used to assist individuals at or below the 80 percent median income would provide us with a policy that would let us serve the individuals in all the communities.

Appendix E.

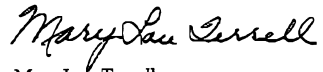
Public Comments and Response

Page 2
Ms. Kimberly A. Green
Executive Director IHFA

I hope to talk with other agencies that provide rental units assisted with HOME DOLLARS and discuss the importance of the policy which could include the 10 percent of units being used to assist individuals at or below the 80 percent of median income.

We look forward to continuing to work with Indiana Housing Finance Authority and researching avenues to provide better service to those in need of rental housing in our small towns and communities.

Sincerely,


Mary Lou Terrell

cc: John Drogan (Hud Office/Indianapolis)

Appendix E.

Public Comments and Response



March 20, 2001

Ms. Mary Lou Terrell, Executive Director
Knox County Housing Authority
R.R. 1, Tilly Estates
Bicknell, IN 47512

Dear Ms. Terrell:

Thank you for attending the Consolidated Plan public meeting held on March 5, 2001, in Washington, Indiana. The comments we received at this meeting help our agency, as well as the other state agencies administering HUD funds, to identify the housing needs and priorities of the citizens of Indiana.

I appreciate your request that IHFA reconsider our policy that 100% of the rental units assisted with HOME funds be reserved for individuals at or below 60% of area median income. As Wendy Landes, IHFA Development Coordinator, explained to you at the meeting, this is slightly more restrictive than the HOME regulations, which allows up to 10% of the units be used to assist individuals at or below 80% of area median income. When I spoke with the Community Development staff about this issue, they indicated that we have not received many requests to change this policy.

IHFA receives more than double the amount of requests for funds than we have to allocate. As a result we must create policies to prioritize projects. One of the priorities we think is important is to serve those projects that assist individuals at the very lowest income levels since the options for such people are more limited than for someone with a higher income. Although this may be an inconvenience at times for some projects, we feel it is a good policy for the state as a whole.

Thank you again for your comments. We look forward to continuing to work with you and your organization to provide safe, decent, and affordable housing for Indiana residents.

Sincerely,

Kimberly A. Green
Executive Director

KAG/wcl



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Appendix E.

Public Comments and Response



May 7, 2001

Ms. Mary Lou Terrell, Executive Director
Knox County Housing Authority
11 Powell Street
Tilly Estate Office
Bicknell, IN 47512

Dear Ms. Terrell:

Thank you for your letter of March 28, 2001. I will forward your comments on to the Consolidated Plan committee for inclusion in this year's report.

We have decided not to change our policy at this time for rental housing assisted through the HOME Investment Partnerships Program (HOME). Tenants are limited to 60% of the area median income. However, applicants for HOME funds may propose to structure a rental development to include both HOME-assisted and non-assisted units. Non-assisted units are considered market-rate, and the Indiana Housing Finance Authority (IHFA) does not restrict rents or set income limits for these units. Additionally, funding is available to rehabilitate units for persons up to 80% of the area median income through the Community Development Block Grant (CDBG) program.

We will continue to consider your comments as we work to develop our 2002 application packages. Next spring, we will hold our public meetings regarding revisions to the application package in conjunction with the public meetings for the Consolidated Plan. Please feel free to share your comments or concerns regarding this policy again at that time.

Thank you again for your comments.

Sincerely,

A handwritten signature in cursive script that reads "Sheryl M. Sharpe".

Sheryl M. Sharpe
Development Manager

cc: Kimberly Green, Executive Director
File



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Appendix E.

Public Comments and Response

Letter No. 11



Daviness County Chamber of Commerce

1 Train Depot Street
Washington, Indiana 47501
(812) 254-5262 • Fax (812) 254-2550

March 12, 2001

Linda D. Kelp
Office of Research
Ball State University
Muncie IN 47306

Dear Linda:

Thank you for your time spent in Washington, Indiana. I have held this position for about 2½ years after twenty years owning and operating several private businesses. Over the last 2½ years, I have attended many meetings related to housing programs.

It seems to me there are more programs than money available to properly fund them. Also, people who may be very good at their programs know very little about the rest of programs. I mentioned to you when you were here that these programs should be run like a private business so here goes!

Forget applications – rotate areas of the state to be covered by county or counties. Many needs in many areas are not met because programs are not understood or know about.

Let government personnel work in these areas with locals to assess needs and programs with money in hand to get the job done. Much too much time is spent on the process that eats up valuable resources that could go toward achieving the goal.

On the surface it appears there are too many programs and not enough funding. Set your priorities and put your funding towards them and then move on. Take steps to take politics out of the programs. Be fair to all. An area of the state may only receive funding every five or six years but they would address those needs and make their decision on things they know.

There are very talented individuals that work for state agencies. Simplify for them, simplify for us. Let them work with the locals to determine the solution to the problems in that area. This whole process should not be a feast or famine for those involved. If you have any questions, please feel free to call the number listed on the enclosed card. It is the government's duty to serve all its citizens – not just the ones who have the resources to search and apply for these needed programs. Thanks for your time and consideration.

Sincerely,

Ron Arnold
Executive Director
Daviness County Chamber of Commerce

RA: cjl

Appendix F.

2000 Fund Allocations

Funding allocations for the 2000 fiscal year are presented in this appendix. The following provides summary distributions for each of the respective programs.

Indiana Department of Commerce, CDBG Program

The State was awarded approximately \$36.5 million in CDBG funds in 2000. The majority of this funding, \$27 million, was allocated to the Community Focus Fund (CFF) Program. A variety of projects were funded through the CFF, including:

- Seven community centers totaling \$2.8 million;
- Three daycare centers totaling \$936,000;
- Two fire stations and five fire trucks, both totaling \$1.3 million;
- Two libraries totaling \$887,000;
- Two historic preservation projects totaling \$850,000;
- Five senior centers totaling \$2.1 million;
- Fifteen wastewater projects totaling \$6.8 million; and,
- Twenty drinking water projects totaling \$8.3 million.

About \$25million in local dollars were contributed to the projects listed above.

The Community Economic Development Fund received \$3 million in 2000. These funds were used for projects that supported economic development, including construction of infrastructure; purchase of real property and equipment; job-training costs for low and moderate income individuals; and environmental improvement. The Housing Development Fund was allocated \$5 million; uses of these funds are discussed in the IHFA allocation section below. The Planning Fund was allocated \$1.3 million to support planning activities that assist local governments with community development. The Technical Assistance fund received approximately \$366,000 in 2000 and the Administrative Fund Setaside was allocated \$831,000.

Indiana Housing Finance Authority, HOME Program

IHFA was awarded \$14.2 million in HOME and CDBG funds (through the state's Housing Development Fund) during FY 1999-2000. About 97 percent of the \$5.1 million in the Housing Development Fund (HDF) was dedicated to the Housing from Shelters to Homeownership program; 3 percent, or about \$150,000, funded housing needs assessments. Approximately two-thirds of the

Appendix F.

2000 Fund Allocations

CDBG funds dedicated to Housing from Shelters to Homeownership funded owner occupied rehabilitation projects; one quarter funded emergency shelters rehabilitation and new construction; and the remainder funded rental rehabilitation projects.

The majority (\$6.9 million or 68 percent) of HOME grant monies were allocated to Housing from Shelters to Homeownership, which funded a variety of projects, including transitional housing, rental rehabilitation and new construction, owner occupied rehabilitation, homebuyer rehabilitation and new construction, and homeownership counseling and downpayment assistance. The HOME grant also funded predevelopment loans and technical assistance for CHDOs; first time homebuyer downpayment assistance; and supplemented rental housing tax credits.

A complete accounting of these allocations is located with the HOME Allocation Plan in Appendix G.

Indiana State Department of Health, HOPWA Program

ISDH was awarded \$654,000 in 2000. These funds were allocated to several activities, including provision of tenant-based rent assistance, emergency assistance, capacity-building assistance, and supportive services.

Indiana Family and Social Services Administration

The total dollar amount awarded to ESG grantees during FY2000 was \$1.65 million. Twenty-two percent of these dollars funded essential services, 66 percent operations and 12 percent homeless prevention activities. Remaining funds were used in areas of grant administration and development of a pilot program called Services for Children in Homeless Shelters. The grants funded approximately 3,000 beds and provided service to more than 25,000 clients, who represented the following population groups:

- Chemically dependent persons;
- Unaccompanied/pregnant unaccompanied women;
- Single parent families;
- Two parent families;
- Adult couples with kids;
- Victims of domestic violence;
- Victims of sexual assault;
- Neglected and abused children;
- Persons living with AIDS/HIV;
- Unaccompanied adult males and adult males; and
- Complete families.

Appendix G.

2001 Allocation Plan

This appendix presents the FY2001 allocation plans for the Indiana Department of Commerce – administrator of the CDBG grant program; the Indiana Housing Finance Authority – administrator of HOME funding; the Indiana State Department of Health – administrator of HOPWA funding through AIDServe Indiana; and the Family and Social Services Administration – administrator of the ESG program.

CDBG Allocation Plan

STATE OF INDIANA
STATE COMMUNITY DEVELOPMENT BLOCK GRANT
(CDBG) PROGRAM (CFDA: 14-228)
INDIANA DEPARTMENT OF COMMERCE
FY 2001 PROGRAM DESIGN AND METHOD OF DISTRIBUTION

GENERAL BACKGROUND INFORMATION AND NATIONAL CDBG OBJECTIVES

The State of Indiana, through the Indiana Department of Commerce, assumed administrative responsibility for Indiana's Small Cities Community Development Block Grant (CDBG) Program in 1982, under the auspices of the U.S. Department of Housing and Urban Development (HUD). In accordance with 570.485(a) and 24 CFR Part 91, the State must submit a Consolidated Plan Update to HUD by May 15th of each year following an appropriate citizen participation process pursuant to 24 CFR Part 91.325, which prescribes the State's Consolidated Plan Update process as well as the proposed method of distribution of CDBG funds for 2001. **The State of Indiana's anticipated allocation of federal Community Development Block Grant (CDBG) funds for FY 2001 is \$38,130,000.**

This document applies to all federal Small Cities CDBG funds allocated by HUD to the State of Indiana, through its Department of Commerce. **During FY 2001, the State of Indiana does not propose to pledge a portion of its present and future allocation(s) of Small Cities CDBG funds as security for Section 108 loan guarantees provided for under Subpart M of 24 CFR Part 570 (24 CFR 570.700).**

The primary objective of Indiana's Small Cities CDBG Program is to assist in the development and re-development of viable Indiana communities by using CDBG funds to provide a suitable living environment and expand economic opportunities, principally for low and moderate income persons.

Indiana's program will place emphasis on making Indiana communities a better place in which to reside, work, and recreate. Primary attention will be given to activities, which promote long term community development and create an environment conducive to new or expanded employment opportunities for low and moderate income persons.

Activities and projects funded by the Department of Commerce must be eligible for CDBG assistance pursuant to 24 CFR 570, et. seq., and meet one of the three (3) national objectives prescribed under the Federal Housing and Community Development Act, as amended (Federal Act). To fulfill a national CDBG objective a project must meet one (1) of the following requirements pursuant to Section 104 (b)(3) of the Federal Act, and 24 CFR 570.483, et seq., and must be satisfactorily documented by the recipient:

1. Principally benefit persons of low and moderate income families; or,
2. Aid in the prevention or elimination of slums and blight; or,
3. Undertake activities, which have urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where no other financial resources are available to meet such needs.

In implementing its FY 2001 CDBG Consolidated Plan Update, the Indiana Department of Commerce will pursue the following goals respective to the use and distribution of FY 2001 CDBG funds:

GOAL 1: Invest in the needs of Indiana's low and moderate income citizens in the following areas:

- a. Safe, sanitary and suitable housing

- b. Child care
- c. Health services
- d. Homelessness
- e. Job creation, retention and training
- f. Self-sufficiency for special needs groups
- g. Senior lifestyles

The Department of Commerce will pursue this goal of **investing in the needs of Indiana's low and moderate income citizens** and all applicable strategic priorities by distributing CDBG funds in a manner which promotes suitable housing, viable communities and economic opportunities.

GOAL 2: Invest in the needs of Indiana's communities in the following areas:

- a. Housing preservation, creation and supply of suitable rental housing
- b. Neighborhood revitalization
- c. Public infrastructure improvements
- d. Provision of clean water and public solid waste disposal
- e. Special needs of limited-clientele groups
- f. Assist local communities with local economic development projects, which will result in the attraction, expansion and retention of employment opportunities for low and moderate income persons

The Department of Commerce will pursue this goal of investing in the needs of Indiana's communities and all applicable strategic priorities by distributing CDBG funds in a manner which promotes suitable housing, preservation of neighborhoods, provision and improvements of local public infrastructure and programs which assist persons with special needs. The Department of Commerce will also pursue this goal by making CDBG funds available to projects, which will expand and/or retain employment opportunities for low and moderate income persons.

GOAL 3: Invest CDBG funds wisely and in a manner which leverages all tangible and intangible resources:

- a. Leverage CDBG funds with all available federal, state and local financial and personal resources
- b. Invest in the provision of technical assistance to CDBG applicants and local capacity building
- c. Seek citizen input on investment of CDBG funds
- d. Coordination of resources (federal, state and local)
- e. Promote participation of minority business enterprises (MBE) and women business enterprises (WBE)
- f. Use performance measures and continued monitoring activities in making funding decisions

The Department of Commerce will pursue this goal of **investing CDBG wisely** and all applicable strategic priorities by distributing CDBG funds in a manner, which promotes exploration of all alternative resources (financial and personal) when making funding decisions respective to applications for CDBG funding.

PROGRAM AMENDMENTS

The Indiana Department of Commerce reserves the right to transfer up to ten percent (10%) of each fiscal year's available allocation of CDBG funds (i.e. FY 2001 as well as prior-years' reversions balances) between the programs described herein in order to optimize the use and timeliness of distribution and expenditure of CDBG funds, without formal amendment of this Consolidated Plan Update.

The Department of Commerce will provide citizens and general units of local government with reasonable notice of, and opportunity to comment on, any substantial change proposed to be made in the use of FY 2001 CDBG as well as reversions and residual available balances of prior-years' CDBG funds. "Substantial Change" shall mean the movement between programs of more than ten percent (10%) of the total allocation for a given fiscal year's CDBG funding allocation, or a major modification to programs described herein. The Department of Commerce, in

consultation with the Indianapolis office of the US Department of Housing and Urban Development (HUD), will determine those actions, which may constitute a “substantial change”.

The State (IDOC) will formally amend its FY 2001 Consolidated Plan Update if the Department of Commerce’s **Method of Distribution for FY 2001 and prior-years funds** prescribed herein is to be significantly changed. The IDOC will determine the necessary changes, prepare the proposed amendment, provide the public and units of general local government with reasonable notice and opportunity to comment on the proposed amendment, consider the comments received, and make the amended FY 2001 Consolidated Plan Update available to the public at the time it is submitted to HUD. In addition, the Department of Commerce will submit to HUD the amended Consolidated Plan Update before the Department implements any changes embodied in such program amendment.

ELIGIBLE ACTIVITIES/FUNDABILITY

All activities, which are eligible for federal CDBG funding under Section 105 of the Federal Housing and Community Development Act of 1974, as amended (Federal Act), are eligible for funding under the Indiana Department of Commerce’s FY 2001 CDBG program. However, the Indiana Department of Commerce reserves the right to prioritize its method of funding; the Department of Commerce prefers to expend federal CDBG funds on activities/projects which will produce tangible results for principally low and moderate income persons in Indiana. Funding decisions will be made using criteria and rating systems, which are used for the State's programs and are subject to the availability of funds. It shall be the policy under the state program to give priority to using CDBG funds to pay for actual project costs and not to local administrative costs. **The State of Indiana certifies that not less than seventy-percent (70%) of FY 2001 CDBG funds will be expended for activities principally benefiting low and moderate income persons, as prescribed by 24 CFR 570.484, et. seq.**

ELIGIBLE APPLICANTS

1. All Indiana counties, cities and incorporated towns which do not receive CDBG entitlement funding directly from HUD or are not located in an "urban county" or other area eligible for "entitlement" funding from HUD.
2. All Indian tribes meeting the criteria set forth in Section 102 (a)(17) of the Federal Act.

In order to be eligible for CDBG funding, applicants may not be suspended from participation in the HUD-funded CDBG Programs or the Indiana Department of Commerce due to findings/irregularities with previous CDBG grants or other reasons. In addition, applicants may not be suspended from participation in the state CDBG-funded projects administered by the Indiana Housing Finance Authority (IHFA), such funds being subcontracted to the IHFA by the Department of Commerce.

Further, in order to be eligible for CDBG funding, applicants may not have overdue reports, overdue responses to monitoring issues, or overdue grant closeout documents for projects funded by either the Department of Commerce or IHFA projects funded using state CDBG funds allocated to the IHFA by the Department of Commerce. All applicants for CDBG funding must fully expend all CDBG Program Income as defined in 24 CFR 570.489(e) prior to, or as a part of the proposed CDBG-assisted project, in order to be eligible for further CDBG funding from the State. This requirement shall not apply to principal and interest balances within a local CDBG Revolving Loan Fund approved by the Department of Commerce pursuant to 24 CFR 570.489.

Other specific eligibility criteria are outlined in **General Selection Criteria** provided herein.

FY 2001 FUND DISTRIBUTION

Sources of Funds:

FY 2001 CDBG Allocation	\$ 38,130,000
CDBG Program Income(a)	<u>0</u>
Total:	<u>\$ 38,130,000</u>

Uses of Funds:

1. Community Focus Fund (CFF)	\$ 24,886,100
2. Housing Program	5,000,000
3. Quick Response Fund	0
4. Community Economic Development Fund	4,000,000
5. Brownfield Initiative	1,400,000
6. Technical Assistance Fund	381,300
7. Planning Fund	1,600,000
8. Administration	<u>862,600</u>
Total:	<u>\$ 38,130,000</u>

(a) The State of Indiana (Department of Commerce) does not project receipt of any CDBG program income for the period covered by this FY 2001 Consolidated Plan Update. In the event the Department of Commerce receives such CDBG Program Income, such moneys will be placed in the Planning Fund for the purpose of making additional competitive grants under that program. Reversions of other years' funding will be placed in the Community Focus Fund for the specific year of funding reverted. The State will allocate and expend all CDBG Program Income funds received prior to drawing additional CDBG funds from the US Treasury. However, the following exceptions shall apply:

1. This prior-use policy shall not apply to housing-related grants made to applicants by the Indiana Housing Finance Authority (IHFA), a separate agency, using CDBG funds allocated to the IHFA by the Department of Commerce.
2. CDBG program income funds contained in a duly established local Revolving Loan Fund(s) for economic development or housing rehabilitation loans which have been formally approved by the Department of Commerce. However, all local revolving loan funds must be "revolving" and cannot possess a balance of more than \$50,000 at the time of application of additional CDBG funds.
3. Program income generated by CDBG grants awarded by the Department of Commerce (State) using FY 2001 CDBG funds must be returned to the Department of Commerce, however, such amounts of less than \$25,000 per calendar year shall be excluded from the definition of CDBG Program Income pursuant to 24 CFR 570.489.

All obligations of CDBG program income to projects/activities, except locally-administered revolving loan funds approved by the Department of Commerce, require prior approval by the Department of Commerce. This includes use of program income as matching funds for CDBG-funded grants from the IHFA. Applicable parties should contact the Grants Management Section of the Controller's Office of the Indiana Department of Commerce at (317) 232-8333 for application instructions and documents for use of program income prior to obligation of such funds.

Furthermore, U.S. Department of Treasury regulations require that CDBG program income cash balances on hand be expended on any active CDBG grant being administered by a grantee before additional federal CDBG funds are requested from the Department of Commerce. These US Treasury regulations apply to projects funded both by IHFA and the Department of Commerce. Eligible applicants with CDBG program income should strive to close out all active grant projects presently being administered before seeking additional CDBG assistance from the Department of Commerce or IHFA.

Eligible applicants with CDBG program income should contact the Grants Management Section of the Controller's Office of the Department of Commerce at (317) 232-8333 for clarification before submitting an application for CDBG financial assistance.

METHOD OF DISTRIBUTION

The choice of activities on which the State (Department of Commerce) CDBG funds are expended represents a determination by Department of Commerce and eligible units of general local government, developed in accordance with the Department's CDBG program design and procedures prescribed herein. The eligible activities enumerated in the following Method of Distribution are eligible CDBG activities as provided for under Section 105(a) of the Federal Act, as amended.

All projects/activities funded by the State (Department of Commerce) will be made on a basis which addresses one (1) of the three (3) national objectives of the Small Cities CDBG Program as prescribed under Section 104(b)(3) of the Federal Act and 24 CFR 570.483 of implementing regulations promulgated by HUD. CDBG funds will be distributed according to the following Method of Distribution (program descriptions):

A. Community Focus Fund (CFF): \$24,967,580

The Department Commerce will award community Focus Fund (CFF) grants to eligible applicants to assist Indiana communities in the areas of public facilities, housing-related infrastructure, and all other eligible community development needs/projects. Applications for economic development activities may not be appropriate for the CFF Program. Applications for funding, which are applicable to local economic development and/or job-related training projects, should be pursued under the Department of Commerce's Community Economic Development Fund (CEDF). Projects eligible for consideration under the CEDF program under this Method of Distribution shall generally not be eligible for consideration under the CFF Program. Eligible activities include applicable activities listed under Section 105(a) of the Federal Act. Typical Community Focus Fund (CFF) projects include, but are not limited to:

1. Local infrastructure improvements (i.e. water, sewer, street and related improvements);
2. Construction of other public facilities (i.e. day-care centers, senior centers, etc.);
3. Commercial rehabilitation and downtown revitalization projects; and,
4. Special purpose facilities for "limited clientele" populations;

Applications will be accepted and awards will be made on a competitive basis two (2) times a year. Approximately one-half of available CFF funds shall be budgeted for each funding round and awards will be scored competitively based upon the following criteria (total possible numerical score of 1,000 points):

1. Economic and Demographic Characteristics: 450 Points - Variable by Each Application:

- a. Benefit to low and moderate income persons: 200 points
- b. Community distress factors: 250 points

2. Project Design Factors: 450 Points - Variable by Each Application:

- a. Financial impact
- b. Project need
- c. Local effort

3. Local Match Contribution: 100 Points - Variable by Each Application

The specific threshold criteria and basis for project point awards for CFF grant awards are provided in attachments hereto. The Community Focus Fund (CFF) Program shall have a maximum grant amount of \$500,000 for each project and each applicant may apply for only one project in a grant cycle. The only exception to this \$500,000 limit will be for those CFF applicants who apply for the Department of Commerce's Minority Business Enterprise

(MBE) Utilization Program. Under this program, the Department of Commerce will allocate an additional amount of CDBG-CFF grant funds to those applicants who apply for participation in the MBE program and who are awarded CFF grants. The maximum additional allocation to the CFF grant amount will be five-percent (5%) of the total amount of CDBG allocated to each CFF budget line item to be considered participatory for such MBE utilization, limited to \$25,000 ($\$500,000 \times 0.05 = \$25,000$).

Projects will be funded in two (2) cycles each year with approximately a six (6) month pre-application and final-application process. Projects will compete for CFF funding and be judged and ranked according to a standard rating system (Attachment D). The highest ranking projects will be funded to the extent of funding available for each specific CFF funding cycle/round. The Department of Commerce will provide eligible applicants with adequate notice of deadlines for submission of CFF proposal (pre-application) and full applications. Specific threshold criteria and point awards are explained in Attachments C and D to this Consolidated Plan Update.

For the CFF Program specifically, the amount of CDBG funds granted will be based on a reasonable cost per project beneficiary, except for housing-related projects (e.g. infrastructure in support of housing) where the grant amount per beneficiary ratio will not exceed \$10,000 per beneficiary.

B. Housing Program: \$5,000,000

The State (Department of Commerce) has contracted with the Indiana Housing Finance Authority (IHFA) to administer funds allocated to the State's Housing Program. The Indiana Housing Finance Authority will act as the administrative agent on behalf of the Indiana Department of Commerce. Please refer to the Indiana Housing Finance Authority's portion of this FY 2001 Consolidated Plan Update for the method of distribution of such subcontracted CDBG funds from the Department of Commerce to the IHFA.

C. Community Economic Development Fund/Program: \$4,000,000

The Community Economic Development Fund (CEDF) will be available through the Development Finance Division of the Indiana Department of Commerce. This fund will provide funding for various eligible economic development activities pursuant to 24 CFR 507.203. The CEDF Program will have a sub-program entitled the Industrial Development Infrastructure Program (IDIP), hereunder the Department of Commerce will give priority for CEDF-IDIP funding to construction of off-site and on-site infrastructure projects in support of low and moderate income employment opportunities.

Eligible CEDF activities will include any eligible activity under 24 CFR 570.203, to include the following:

1. Construction of infrastructure (public and private) in support of economic development projects;
2. Loans or grants by applicants for the purchase of manufacturing equipment;
3. Loans or grants by applicants for the purchase of real property and structures (includes vacant structures);
4. Loans or grants by applicants for the rehabilitation of facilities (vacant or occupied);
5. Loans or grants by applicants for the purchase and installation of pollution control equipment;
6. Loans or grants by applicants for the mitigation of environmental problems via capital asset purchases;

Eligible CEDF activities will also include grants to applicants for job-training costs for low and moderate income persons as a limited clientele activity under 24 CFR 570.483(b)(2)(v).

Projects/applications will be evaluated using the following criteria:

1. The importance of the project to Indiana's economic development goals;
2. The number and quality of new jobs to be created;
3. The economic needs of the affected community;
4. The economic feasibility of the project and the financial need of the affected for-profit firm, or not-for-profit corporation; the availability of private resources;
5. The level of private sector investment in the project.

Grant applications will be accepted and awards made until funding is no longer available. The intent of the program is to provide necessary public improvements and/or job training for an economic development project to encourage the creation of new jobs. In some instances, the Department of Commerce may determine that the needed facilities/improvements may also benefit the project area as a whole (i.e. certain water, sewer, and other public facilities improvements), in which case the applicant will be required to also meet the “area basis” criteria for funding under the Federal Act.

1. Beneficiaries and Job Creation/Retention Assessment:

The assistance must be reasonable in relation to the expected number of jobs to be created or retained by the benefiting business(es) within 12 months following the date of substantial completion of project construction activities. Before CDBG assistance will be provided for such an activity, the applicant unit of general local government must develop an assessment, which identifies the businesses located or expected to locate in the area to be served by the improvement. The assessment must include for each identified business a projection of the number of jobs to be created or retained as a result of the public improvements.

2. Public Benefit Standards:

The Department of Commerce will conform to the provisions of 24 CFR 570.482(f) for purposes of determining standards for public benefit and meeting the national objective of low and moderate income job creation or retention will be all jobs created or retained as a result of the public improvement, financial assistance, and/or job training by the business(es) identified in the job creation/retention assessment in 1 above. The investment of CDBG funds in any economic development project shall not exceed an amount of \$35,000 per job created; at least fifty-one percent (51%) of all such jobs, during the project period, shall be given to, or made available to, low and moderate income persons.

Projects will be evaluated on the amount of private investment to be made, the number of jobs for low and moderate income persons to be created or retained, the cost of the public improvement and/or job training to be provided, the ability of the community (and, if appropriate, the assisted company) to contribute to the costs of the project, and the relative economic distress of the community. Actual grant amounts are negotiated on a case by case basis and the amount of assistance will be dependent upon the number of new full-time permanent jobs to be created and other factors described above. Construction and other temporary jobs may not be included. Part-time jobs are ineligible in the calculating equivalents. Grants made on the basis of job retention will require documentation that the jobs will be lost without such CDBG assistance and a minimum of fifty-one percent (51%) of the beneficiaries are of low and moderate income.

Pursuant to Section 105(e)(2) of the Federal Act as amended, and 24 CFR 570.209 of related HUD regulations, CDBG-CEDF funds allocated for direct grants or loans to for-profit enterprises must meet the following tests, (1) project costs must be reasonable, (2) to the extent practicable, reasonable financial support has been committed for project activities from non-federal sources prior to disbursement of federal CDBG funds, (3) any grant amounts provided for project activities do not substantially reduce the amount of non-federal financial support for the project, (4) project activities are determined to be financially feasible, (5) project-related return on investment are determined to be reasonable under current market conditions, and, (6) disbursement of CDBG funds on the project will be on an appropriate level relative to other sources and amounts of project funding.

A need (financial gap), which is not directly available through other means of private financing, should be documented in order to qualify for such assistance; the Department of Commerce will verify this need (financial gap) based upon historical and/or pro-forma projected financial information provided by the for-profit company to be assisted. Applications for loans based upon job retention must document that such jobs would be lost without CDBG assistance and a minimum of fifty-one percent (51%) of beneficiaries are of low-and-moderate income, or the recipient for-profit entity agrees that for all new hires, at least 51% of such employment opportunities will be given to, or made available to, persons of low and moderate income. All such job retention/hiring performance must be documented by the applicant/grantee, and the DOC reserves the right to track job levels for an additional two (2) years after administrative closeout.

D. Brownfields Initiative

The Department of Commerce will set aside \$1,400,000 of its FY 2001 CDBG funds for a brownfields pilot initiative. The Department of Commerce will make grants to units of local government to carry out various activities eligible under 24 CFR 507.291-203, in order to facilitate the redevelopment of brownfield properties. The Department will award such grants on a competitive basis. The Department's Community Development Division will coordinate this initiative.

E. The Quick Response Fund: \$0

The Quick Response Fund will be available to eligible applicants on a continuing basis. These activities must be eligible for funding under the "urgent need" national objective of the Federal Act and requirements of 24 CFR 570.208 and 24 CFR 570.483 of applicable HUD regulations.

The Quick Response Fund program will be available to eligible applicants to meet an imminent threat to the health and safety of local populations. The grants may be funded as made available through Focus Fund or reversions when not budgeted from the annual allocation. Special selection factors include need, proof of recent threat of a catastrophic nature, statement of declared emergency and inability to fund through other means. Projects will be developed with the assistance of the Community Development Division as a particular need arises. To be eligible, these projects and their activities must meet the "urgent need" national objective of Section 104(b)(3) of the Federal Act. Generally, projects funded are those, which need immediate attention and are, therefore, inappropriate for consideration under the Community Focus Fund. The types of projects, which typically receive funding, are municipal water systems (where the supply of potable water has been threatened by severe weather conditions) and assistance with demolition or cleanup after a major fire, flood, or other natural disaster. Although all projects will be required to meet the "urgent need" national objective, the Department of Commerce may choose to actually fund the project under one of the other two national objectives, if it deems it expedient to do so. Applicants must adequately document that other financial resources are not available to meet such needs pursuant to Section 104(b)(3) of the Federal Act and 24 CFR 570.483 of HUD regulations.

Only that portion of a project, which addresses an immediate need, should be addressed. This is particularly true of municipal water or sewer system projects, which tend to need major reinvestment in existing plants or facilities, in addition to the correction of the immediate need. The amount of grant award is determined by the individual circumstances surrounding the request for emergency funds. A community may be required to provide a match through cash, debt or provision of employee labor.

The Quick Response Fund will also be available to eligible activities, which meet the "benefit to low and moderate income" or "prevention and elimination of slums and blight" goals of the Federal Act. The community must demonstrate that the situation requires immediate attention (i.e., that participation in CFF program would not be a feasible funding alternative or poses an immediate or imminent threat to the health or welfare of the community) and that the situation is not the result of negligence on the part of the community. Communities must be able to demonstrate that reasonable efforts have been made to provide or obtain financing from other resources and that such efforts were unsuccessful, unwieldy or inadequate. Alternatively, communities must be able to demonstrate that an opportunity to complete a project of significant importance to the community would be lost if required to adhere to the timetables of competitive programs.

F. Technical Assistance: \$382,140

Pursuant to the federal Housing and Community Development Act (Federal Act), specifically Section 106(d)(5), the State of Indiana is authorized to set aside up to one percent (1%) of its total allocation for technical assistance activities. The amount set aside for such Technical Assistance in the State's FY 2001 Consolidated Plan Update is \$365,630, which constitutes one-percent (1%) of the State's FY 2001 CDBG allocation of \$38,130,000. The State of Indiana reserves the right to set aside up to one percent (1%) of open prior-year funding amounts for the costs of providing technical assistance on an as-needed basis.

The amount set aside for the Technical Assistance Program will not be considered a planning cost as defined under Section 105(a)(12) of the Federal Act or an administrative cost as defined under Section 105(a)(13) of the Federal Act. Accordingly, such amounts set aside for Technical Assistance will not require matching funds by the State of Indiana. The Department reserves the right to transfer a portion or all of the funding set aside for Technical Assistance to another program hereunder as deemed appropriate by the Department of Commerce, in accordance with the "Program Amendments" provisions of this document. The Technical Assistance Program is designed to provide, through direct Department of Commerce staff resources or by contract, training and technical assistance to units of general local government, nonprofit and for-profit entities relative to community and economic development initiatives, activities and associated project management requirements.

1. Distribution of the Technical Assistance Program Setaside: Pursuant to HUD regulations and policy memoranda, the Department of Commerce may use alternative methodologies for delivering technical assistance to units of local government and nonprofits to carry out eligible activities, to include:

- a. Provide the technical assistance directly with Department of Commerce or other State staff;
- b. Hire a contractor to provide assistance;
- c. Use subrecipients such as Regional Planning Organizations as providers or securers of the assistance;
- d. Directly allocate the funds to non-profits and units of general local governments to secure/contract for technical assistance.
- e. Pay for tuition, training, and/or travel fees for specific trainees from units of general local governments and nonprofits;
- f. Transfer funds to another state agency for the provision of technical assistance; and,
- g. Contracts with state-funded institutions of higher education to provide the assistance.

2. Ineligible Uses of the Technical Assistance Program Setaside: The 1% setaside may not be used by the Department of Commerce for the following activities:

- a. Local administrative expenses not related to community development;
- b. Any activity that can not be documented as meeting a technical assistance need;
- c. General administrative activities of the State not relating to technical assistance, such as monitoring state grantees, rating and ranking State applications for CDBG assistance, and drawing funds from the Department of Commerce; or,
- d. Activities that are meant to train State staff to perform state administrative functions, rather than to train units of general local governments and non-profits.

G. Planning Fund: \$ 1,600,000

The State (Department of Commerce) will set aside \$1,600,000 of its FY 2001 CDBG funds for planning-only activities, which are of a project-specific nature. The Department of Commerce will make planning-only grants to units of local government to carry out planning activities eligible under 24 CFR 570.205 of applicable HUD regulations. The Department will award such grants on a competitive basis and grant the Department's Community Development Division will review applications monthly. The Department will give priority to project-specific applications having planning activities designed to assist the applicable unit of local government in meeting its community development needs by reviewing all possible sources of funding, not simply the Department's Community Focus Fund or Community Economic Development Fund.

CDBG-funded planning costs will exclude final engineering and design costs related to a specific activity which are eligible activities/costs under 24 CFR 570.201-204.

G. Administrative Funds Setaside: \$ 864,280

The State (Department of Commerce) will set aside \$864,280 of its FY 2001 CDBG funds for payment of costs associated with administering its State Community Development Block Grant (CDBG) Program (CFDA Number 14.228). This amount (\$864,280) constitutes two-percent (2%) of the State's FY 2001 CDBG allocation (\$764,280),

plus an amount of \$100,000 ($\$38,130,000 \times 0.02 = \$764,280 + \$100,000 = \$864,280$). The amount constituted by the 2% setaside (\$764,280) is subject to the \$1-for-\$1 matching requirement of HUD regulations. The \$100,000 supplement is not subject to state match. These funds will be used by the Department of Commerce for expenses associated with administering its State CDBG Program, including direct personal services and fringe benefits of applicable Department of Commerce staff, as well as direct and indirect expenses incurred in the proper administration of the state's program and monitoring activities respective to CDBG grants awarded to units of local government (i.e. telephone, travel, services contractual, etc.). These administrative funds will also be used to pay for contractors hired to assist the Department of Commerce in its consolidated planning activities.

PRIOR YEARS' METHODS OF DISTRIBUTION

This Consolidated Plan, statement of Method of Distribution is intended to amend all prior Consolidated Plans for grant years where funds are still available to reflect the new program designs. The Methods of Distribution described in this document will be in effect commencing on June 1, 2001, and ending May 31, 2001, unless subsequently amended, for all FY 2001 CDBG funds as well as remaining residual balances of previous years' funding allocations, as may be amended from time to time subject to the provisions governing "Program Amendments" herein. The existing and amended program budgets for each year are outlined below (administrative fund allocations have not changed and are not shown below). Adjustments in the actual dollars may occur as additional reversions become available. Program Income received and not specifically generated from recaptured proceeds from the GAP Financing Program shall be allocated to the Community Focus Fund (CFF).

At this time there are only nominal funds available for reprogramming for prior years' funds. If such funds should become available, they will be placed in the CFF Fund. This will include reversions from settlement of completed grantee projects., there are no fund changes anticipated. For prior years' allocations there are no fund changes anticipated. Non-expended funds, which revert from the financial settlement of projects funded from other programs, will be placed in the Community Focus Fund (CFF).

PROGRAM APPLICATION

The Community Economic Development Fund Program (CEDF), Quick Response Program (QR), and Planning Fund/Program (PL) will be conducted through a single-stage, continuous application process throughout the program year. The application process for the Community Focus Fund (CFF) will be divided into two stages. Eligible applicants will first submit a short program proposal for such grants. Proposers with projects eligible under the Federal Act will be invited to submit a full application. For each program, the full application will be reviewed and evaluated. The IDOC's Community Development Division and Development Finance Division, as applicable, will provide technical assistance to the communities in the development of proposals and full applications.

An eligible applicant may submit only one Community Focus Fund (CFF) application per cycle. Additional applications may be submitted under the other state programs. The Department of Commerce reserves the right to negotiate Planning-Only grants with CFF applicants for applications lacking a credible readiness to proceed on the project or having other planning needs to support a CFF project.

OTHER REQUIREMENTS

While administrative responsibility for the Small Cities CDBG program has been assumed by the State of Indiana, the State is still bound by the statutory requirements of the applicable legislation passed by Congress, as well as federal regulations promulgated by the U. S. Department of Housing and Urban Development (HUD) respective to the State's CDBG program as codified under Title 24, Code of the Federal Register. HUD has passed on these responsibilities and requirements to the State and the State is required to provide adequate evidence to HUD that it is carrying out its legal responsibilities under these statutes.

As a result of the Federal Act, applicants who receive funds through the Indiana Department of Commerce selection process will be required to maintain a plan for minimizing displacement of persons as a result of activities assisted

with CDBG funds and to assist persons actually displaced as a result of such activities. Applicants are required to provide reasonable benefits to any person involuntarily and permanently displaced as a result of the use of assistance under this program to acquire or substantially rehabilitate property. The State has adopted standards for determining reasonable relocation benefits in accordance with HUD regulations.

CDBG "Program Income" may be generated as a result of grant implementation. The State of Indiana may enter into an agreement with the grantee in which program income is retained by the grantee for eligible activities. Federal guidelines require that program income be spent prior to requesting additional draw downs. Expenditure of such funds requires prior approval from the Department of Commerce (IDOC). The State (Department of Commerce) will follow HUD regulations set forth under 24 CFR 570.489(e) respective to the definition and expenditure of CDBG Program Income.

All statutory requirements will become the responsibility of the recipient as part of the terms and conditions of grant award. Assurances relative to specific statutory requirements will be required as part of the application package and funding agreement. Grant recipients will be required to secure and retain certain information, provide reports and document actions as a condition to receiving funds from the program. Grant management techniques and program requirements are explained in the IDOC's CDBG Grantee Implementation Manual, which is provided to each grant recipient.

Revisions to the Federal Act have mandated additional citizen participation requirements for the State and its grantees. The State has adopted a written Citizen Participation Plan, which is available for interested citizens to review. Applicants must certify to the State that they are following a detailed Citizen Participation Plan which meets Title I requirements. Technical assistance will be provided by the Department of Commerce to assist program applicants in meeting citizen participation requirements.

The State has required each applicant for CDBG funds to certify that it has identified its housing and community development needs, including those of low and moderate income persons and the activities to be undertaken to meet those needs.

INDIANA DEPARTMENT OF COMMERCE (IDOC)

The Indiana Department of Commerce intends to provide the maximum technical assistance possible for all of the programs to be funded from the CDBG program. Lieutenant Governor Joseph E. Kernan heads the Department of Commerce. Principal responsibility within the IDOC for the CDBG program is vested in the Executive Director, Thomas F. McKenna. The Deputy Executive Director of the Department of Commerce (Charles R. Martindale) has the responsibility of administering compliance activities respective to CDBG grants awarded to units of local government by the IDOC's Development Finance and Community Development Divisions.

Primary responsibility for providing "outreach" and technical assistance for the Community Focus Fund and Planning Fund process resides with the Community Development Division. Primary responsibility for providing "outreach" and technical assistance for the Community Economic Development Program and award process resides with the Development Finance Division. Primary responsibility for providing "outreach" and technical assistance for the Housing award process resides with the Indiana Housing Finance Authority who will act as the administrative agent on behalf of the Indiana Department of Commerce.

The Controller's Office will also provide internal fiscal support services for program activities. The Grants Management Section of the Controller's Office has overall responsibilities for CDBG program management, compliance and financial monitoring of all CDBG programs. The Indiana State Board of Accounts pursuant to the federal Office of Management and Budget Circular A-133 will conduct audits. Potential applicants should contact the Department of Commerce with any questions or inquiries they may have concerning these or any other programs operated by the Department.

Information regarding the past use of CDBG funds is available at the:

**Indiana Department of Commerce
Community Development Division
One North Capitol, Suite 700
Indianapolis, Indiana 46204-2288
Attention: Charles Martindale, Deputy Executive Director
Telephone: (317) 232-8801
FAX: (317) 233-6503**

DEFINITIONS

Low and moderate income - is defined as 80% of the median family income (adjusted by size) for each county. For a county applicant, this is defined as 80% of the median income for the state. The income limits shall be as defined by the U. S. Department of Housing and Urban Development Section 8 Income Guidelines for “low income families.” Certain persons are considered to be “presumptively” low and moderate income persons as set forth under 24 CFR 570.208(a)(2); inquiries as to such presumptive categories should be directed to the IDOC’s Grants Management Office, Attention: Ms. Kelly Boe at (317) 232-8831.

Matching funds - local public or private sector in-kind services, cash or debt allocated to the CDBG project. The **minimum** level of local matching funds for Community Focus Fund (CFF) projects is ten-percent (10%) of the **total estimated project costs**. This percentage is computed by adding the proposed CFF grant amount and the local matching funds amount, and dividing the local matching funds amount by the total sum of the two amounts. The 2001 definition of match has been adjusted to include a maximum of 5% pre-approved and validated in-kind contributions. The balance of the ten (10) percent must be in the form of either cash or debt. Any in-kind over and above the specified 5% may be designated as local effort. Funds provided to applicants by the State of Indiana such as the Build Indiana Fund are not eligible for use as matching funds.

Private investment resulting from CDBG projects does not constitute local match for all IDOC-CDBG programs except the Community Economic Development Fund (CEDF); such investment will, however, be evaluated as part of the project’s impact, and should be documented. The Development Finance Division reserves the right to determine sources of matching funds for CEDF projects.

Proposal (synonymous with “pre-application) - A document submitted by a community which briefly outlines the proposed project, the principal parties, and the project budget and how the proposed project will meet a goal of the Federal Act. If acceptable, the community may be invited to submit a full application.

Reversions - Funds placed under contract with a community but not expended for the granted purpose because expenses were less than anticipated and/or the project was amended or canceled and such funds were returned to the Department of Commerce upon financial settlement of the project.

Slums or Blight - an area/parcel which: (1) meets a definition of a slum, blighted, deteriorated, or deteriorating area under state or local law (Title 36-7-1-3 of Indiana Code); and (2) meets the requirements for “area basis” slum or blighted conditions pursuant to 24 CFR 570.208(b)(1) and 24 CFR 570.483(c)(1), or “spot basis” blighted conditions pursuant to 24 CFR 570.208(b)(2) and 24 CFR 570.483(c)(2).

Urgent Need - is defined as a serious and immediate threat to health and welfare of the community. The Chief Elected Official must certify that an emergency condition exists and requires immediate resolution and that alternative sources of financing are not available. An application for CDBG funding under the “urgent need” CDBG national objective must adhere to all requirements for same set forth under 24 CFR 570.208(c) and 24 CFR 570.483(d).

DISPLACEMENT PLAN

1. The State shall fund only those applications, which present projects and activities, which will result in the displacement of as few persons or businesses as necessary to meet the goals and objectives of the state and local CDBG-assisted program.
2. The State will use this criterion as one of the guidelines for project selection and funding.
3. The State will require all funded communities to certify that the funded project is minimizing displacement.
4. The State will require all funded communities to maintain a local plan for minimizing displacement of persons or businesses as a result of CDBG funded activities, pursuant to the federal Uniform Relocation and Acquisitions Policies Act of 1970, as amended.
5. The State will require that all CDBG funded communities provide assistance to all persons displaced as a result of CDBG funded activities.
6. The State will require each funded community to provide reasonable benefits to any person involuntarily and permanently displaced as a result of the CDBG funded program.

GENERAL SELECTION CRITERIA

The Department of Commerce (IDOC) will consider the following general criteria when evaluating a project proposal. Although projects will be reviewed for this information at the proposal stage, no project will be eliminated from consideration if the criteria are not met. Instead, the community will be alerted to the problem(s) identified. Communities must have corrected any identified deficiencies by the time of application submission for that project to be considered for funding.

A. General Criteria (all programs - see exception for program income and housing projects through the IHFA in 6 below):

1. The applicant must be a legally constituted general purpose unit of local government and eligible to apply for the state program.
2. The applicant must possess the legal capacity to carry out the proposed program.
3. If the applicant has previously received funds under CDBG, they must have successfully carried out the program. An applicant must not have any overdue closeout reports, State Board of Accounts OMB A-133 audit or IDOC monitoring finding resolutions (where the community is responsible for resolution.) Any determination of "overdue" is solely at the discretion of the Indiana Department of Commerce.
4. An applicant must not have any overdue CDBG semi-annual Grantee Performance Reports, subrecipient reports or other reporting requirements of the IDOC. Any determination of "overdue" is solely at the discretion of the Indiana Department of Commerce.
5. The applicant must clearly show the manner in which the proposed project will meet one of the three national CDBG objectives and meet the criteria set forth under 24 CFR 570.483.
6. The applicant must show that the proposed project is an eligible activity under the Act.
7. The applicant must first encumber/expend all CDBG program income receipts before applying for additional grant funds from the Department of Commerce; EXCEPTION - this general criteria will not apply to applications made directly to the Indiana Housing Finance Authority (IHFA) for CDBG-funded housing projects.

B. Community Focus Fund (CFF) and Planning Fund (PL):

1. To be eligible to apply at the time of application submission, an applicant must not have any:
 - a. Overdue grant reports, subrecipient reports or project closeout documents; or
 - b. More than one open or pending CDBG-CFF grant or CDBG-Planning grant (Indiana cities and incorporated towns).
 - c. For those applicants with one open CFF, a "Notice of Release of Funds and Authorization to Incur Costs" must have been issued for the construction activities under the open CFF contract, and a contract for construction of the principal (largest funding amount) construction line item (activity) must have been executed prior to the deadline established by IDOC for receipt of applications for CFF funding.
 - d. For those applicants who have open Planning Fund grants, the community must have final plan approved by the Community Development Division prior to submission of a CFF application for the project.

- f. An Indiana county may have two (2) open CFF's and/or Planning Grants and apply for a third CFF or Planning Grant. A county may have only three (3) open CFF's or Planning Grants. Both CFF contracts must have an executed construction contract by the application due date.
2. The cost/beneficiary ratio for CFF funds will be maintained at a reasonable rate, except for daycare and housing-related projects where that ratio will not exceed \$10,000. Housing-related projects are to be submitted directly to the Indiana Housing Finance Authority (IHFA) under its programs, except for projects entailing construction of infrastructure (to be publicly dedicated right-of-way) in support of housing-related projects. Projects for infrastructure in support of housing needs may be submitted to the IDOC for CFF funding.
3. At least 10% leveraging (as measured against the CDBG project, see definitions) must be proposed. The Indiana Department of Commerce may rule on the suitability and eligibility of such leveraging.
4. The applicant may only submit one proposal or application per round. Counties may submit either for their own project or an "on-behalf-of" application for projects of other eligible applicants within the county. However, no application will be invited from a county where the purpose is clearly to circumvent the "one application per round" requirement for other eligible applicants.
5. The application must be complete and submitted by the announced deadline.
6. For area basis projects, applicants must provide convincing evidence that circumstances in the community have so changed that a survey conducted in accordance with HUD survey standards is likely to show that 51% of the beneficiaries will be of low-and-moderate income. This determination is not applicable to specifically targeted projects.

C. Housing Programs: Refer to Method of Distribution for Indiana Housing Finance Authority within this FY 2001 Consolidated Plan Update

D. Quick Response Program:

Applicants for the Quick Response Program funds must meet the General Criteria set forth in Section A above, plus the specific program income requirements set forth in the "Method of Distribution" section of this document.

E. Community Economic Development Program/Fund (CEDF):

Applicants for the Community Economic Development Fund assistance must meet the General Criteria set forth in Section A above, plus the specific program requirements set forth in the "Method of Distribution" section of this document.

GRANT EVALUATION CRITERIA – 1,000 POINTS TOTAL

Economic and Demographic Characteristics (450 points):

National Objective Score (200 points):

Depending on the National Objective to be met by the project, one of the following two mechanisms will be used to calculate the score for this category.

1. National Objective = Benefit to Low- and Moderate-Income Persons: 200 points maximum awarded according to the percentage of low- and moderate-income individuals to be served by the project. The total points given are computed as follows:

National Objective Score = % Low/Mod Beneficiaries X 2.5

The point total is capped at 200 points or 80% low/moderate beneficiaries, i.e., a project with 80% or greater low/moderate beneficiaries will receive 200 points. Below 80% benefit to low/moderate-income persons, the formula calculation will apply.

National Objective = Prevention or Elimination of Slums or Blight: 200 points maximum awarded based on the characteristics listed below. The total points given are computed as follows:

National Objective Score = (Total of the points received in each category below) X 2.5

___ Slum/Blight Area or Spot designated by resolution of the local unit of government (50 pts.)

___ Community is an Indiana Main Street Senior Partner or Partner, and the project relates to downtown revitalization (5 pts.)

___ The project is located in an Indiana Urban Enterprise Zone (5 pts.)

___ The project site is a brownfield* (5 pts.)

___ The project is located in a designated redevelopment area under IC 36-7-14 (5 pts.)

___ The building or district is listed on the Indiana or National Register of Historic Places (10 pts.)

___ The building or district is eligible for listing on the Indiana or National Register of Historic Places (5 pts.)

___ The building is on the Historic Landmarks Foundation of Indiana's "10 Most Endangered List" (10 pts.)

* The State of Indiana defines a brownfield as an industrial or commercial property that is abandoned, inactive, or underutilized, on which expansion or redevelopment is complicated due to actual or perceived environmental contamination.

Community Distress Factors (250 Points): the community distress factors used to measure the economic conditions of the applicant community are listed below. Each is described with an explanation and an example of how the points are determined. Each factor can receive a maximum of 50 points with the total distress point calculation having a maximum of 250 points. The formula calculation for each measure is constructed as a percentage calculation along a scale range. The resulting percentage is then translated into a point total on a fifty point scale for each measure.

- a. **Unemployment Rate (50 points maximum):** Unemployment rate for the county of the lead applicant. The average rate for the previous 12 months is used.
 - a. If the unemployment rate is 10% or higher, 50 points are awarded.
 - b. If the unemployment rate is 2% or below, 0 points are awarded.
 - c. Between those values, the points are calculated by taking the unemployment rate, subtracting 2%, dividing by 8% and multiplying by 50, where 2% is the bottom point of the scale and 8% is the range of the scale.

$$\text{Unemployment Rate Points} = [(\text{Unemployment rate} - 2\%) / 8\%] \times 50$$

For example, if the unemployment rate is 5%, take unemployment rate of 5%, subtract 2%, divide by 8%, and multiply by 50. The score would be 18.75 point of a possible 50; $((5-2)/8 \times 50 = 18.75)$

- b. **Net Assessed Value/capita (50 points maximum):** Net assessed value per capita for lead applicant. (Note: The following calculations will be changed as appropriate when the State adjusts the Net Assessed Value.)

To determine the net assessed value per capita, take the appropriate net assessed value and divide by the total 1998 population (projected from census data) of the lead applicant;

$$\text{NAV/capita} = \text{NAV} / \text{Total Population}$$

- c. If the net assessed value/capita for the lead applicant is above \$10,000, 0 points are awarded.
- d. If the net assessed value/capita for the lead applicant is \$3,000 or under, 50 points are awarded.

- e. Between those values, the points are calculated by subtracting the NAV/capita from \$10,000, dividing by \$7000 and multiplying by 50, where \$10,000 is the top of the scale and \$7000 is the range of the scale.

$$\text{NAV/capita points} = [(\$10,000 - \text{NAV/capita})/\$7000] \times 50$$

For example, if the Net Assessed Value/capita is \$4,000, take \$10,000, subtract the NAV/capita of \$4,000, divide by \$7,000, and multiply by 50. The score would be 42.86 points of a possible 50 points; $((10,000 - 4,000)/7000) \times 50 = 42.86$.

- f. **Median Housing Value (50 points maximum):** Median Housing Value for lead applicant.

$$\text{Median Housing Value Points} = [(\$75,000 - \text{median housing value})/\$50,000] \times 50$$

- g. If the median housing value for the lead applicant is \$75,000 or higher, no points are awarded.

- h. If the median housing value for the lead applicant is \$25,000 or lower, 50 points are applicable.

For example, if the median housing value is \$35,000, take \$75,000, subtract the median housing value of \$35,000, divide by \$50,000, and multiply by 50. The score would be 40 points out of a total possible of 50; $((75,000 - 35,000)/50,000) \times 50 = 40$.

- i. **Median Household Income (50 points maximum):**

$$\text{Median Household Income Points} = [(\$50,000 - \text{median household income})/\$25,000] \times 50$$

- j. If the median household income is \$50,000 or higher, no points are awarded.

- k. If the median household income is \$25,000 or lower, 50 points are awarded.

- l. Between those values, the points are calculated by subtracting the median household income from \$50,000, dividing by \$25,000 and multiplying by 50, where \$50,000 is the top of the scale and \$25,000 is the range of the scale.

For example, if the Median Household Income is \$32,500, take \$50,000, subtract the median household income of \$32,500, divide by \$25,000, and multiply by 50. The score would be 35 points out of a possible 50; $((50,000 - 32,500)/25,000) \times 50 = 35$.

- m. **Percentage Population Change (50 points maximum):** Percentage population change (1990-1998).

The percentage change is computed by subtracting the 1990 population from the 1998 population projection and dividing by the 1990 population. Convert this decimal to a percentage by multiplying by 100.

Percentage Population Change = [(1998 population - 1990 population)/1990 population] X 100

- a. If the population increased by 15% or greater, 0 points are awarded.
- b. If the population decreased by 10% or greater, 50 points are awarded.
- c. Between those values, the points are calculated by subtracting the Percent Population Change from 15%, dividing by 25%, and multiplying by 50, where 15% is the top of the scale and 25% is the range of the scale.

Percentage Population Change points = [(15% - Percentage Population Change)/25%] X 50

For example, if the population increased by 3%, take 15%, subtract 3%, divide by 25%, and multiply by 50. The score would be 24 points out of a total possible of 50; $(15-3)/25 \times 50 = 24$.

Local Match Contribution (100 points):

Up to 100 points possible based on the percentage of local funds devoted to the project. This total is determined as follows:

Total Match Points = % Eligible Local Match X 2

Eligible local match can be local cash or debt. Government grants, including Build Indiana Funds, are not considered eligible match. In-kind sources may provide eligible local match for the project, but the amount that can be counted as local match is limited to 5% of the total project budget, up to a maximum of \$25,000. Use of in-kind donations as eligible match is subject to prior approval from the Indiana Department of Commerce, Community Development Division.

Project Design Factors (450 points):

450 points maximum awarded according to the evaluation in three areas:

Project Need - why does the community need this project?

Financial Impact - why is grant assistance necessary to complete this project?

Local Effort - what has/is the community doing to move this project forward?

The project can receive a total of 150 points in each category. The project design points are awarded in 25-point increments. The points in these categories are awarded by the IDOC review team when evaluating the projects. Applicants should work with their IDOC field representative to identify ways to increase their project's scores in these areas.

CITIZEN PARTICIPATION PLAN INDIANA DEPARTMENT OF COMMERCE (STATE)

The State of Indiana, Department of Commerce, pursuant to 24 CFR 91.115, 24 CFR 570.431 and 24 CFR 570.485(a) wishes to encourage maximum feasible opportunities for citizens and units of general local government to provide input and comments as to its Methods of Distribution set forth in the Department's annual Consolidated Plan for CDBG funds submitted to HUD as well as the Department's overall administration of the State's Small Cities Community Development Block Grant (CDBG) Program. In this regard, the Department of Commerce will perform the following:

1. Require each unit of general local government to comply with citizen participation requirements for such governmental units as specified under 24 CFR 570.486(a), to include the requirements for accessibility to information/records and to furnish citizens with information as to proposed CDBG funding assistance as set forth under 24 CFR 570.486(a)(3), provide technical assistance to representatives of low-and-moderate income groups, conduct a minimum of two (2) public hearings on proposed projects to be assisted by CDBG funding, such hearings being accessible to handicapped persons, provide citizens with reasonable advance notice and the opportunity to comment on proposed projects as set forth in Title 5-3-1 of Indiana Code, and provide interested parties with addresses, telephone numbers and times for submitting grievances and complaints.
2. Consult with local elected officials and the Department's Grant Administrator Networking Group in the development of the Method of distribution set forth in the State's Consolidated Plan for CDBG funding submitted to HUD.
3. Publish a proposed or "draft" Consolidated Plan and afford citizens, units of general local government, and the CDBG Policy Advisory committee the opportunity to comment thereon;
4. Furnish citizens and units of general local government with information concerning the amount of CDBG funds available for proposed community development and housing activities and the range/amount of funding to be used for these activities;
5. Hold one (1) or more public hearings respective to the State's proposed/draft Consolidated Plan, on amendments thereto, duly advertised in newspapers of general circulation in major population areas statewide pursuant to I.C. 5-3-1-2 (B), to obtain the views of citizens on proposed community development and housing needs. The Consolidated Plan Committee published the enclosed legal advertisement to twelve (12) regional newspapers of general circulation statewide respective to the public hearings (April 23 and April 24, 2001) held on the 2001 Consolidated Plan Update. In addition, this notice was distributed by mail to over 3,000 local officials, non-profit entities, and interested parties statewide in an effort to maximize citizen participation in the FY 2001 consolidated planning process:

**The Republic, Columbus, IN
Indianapolis Star, Indianapolis, IN
The Journal-Gazette, Fort Wayne, IN
The Chronicle-Tribune, Marion, IN
The Courier Journal, Louisville, KY
Gary Post Tribune, Gary, IN
Tribune Star, Terre Haute, IN**

**Journal & Courier, Lafayette, IN
Evansville Courier, Evansville, IN
South Bend Tribune, South Bend, IN
Palladium-Item, Richmond, IN
The Times, Munster, IN**

6. Provide citizens and units of general local government with reasonable and timely access to records regarding the past and proposed use of CDBG funds,
7. Make the Consolidated Plan available to the public at the time it is submitted to HUD, and;
8. Follow the process and procedures outlined in items 2 through 7 above with respect to any amendments to a given annual CDBG Consolidated Plan and/or submission of the Consolidated Plan to HUD.

In addition, the State also will solicit comments from citizens and units of general local government on its CDBG Performance Review submitted annually to the U.S. Department of Housing and Urban Developments (HUD). Prior to its submission of the Review to HUD, the State will advertise regionally statewide (pursuant to I.C. 5-3-1) in newspapers of general circulation soliciting comments on the Performance and Evaluation Report.

The State will respond within thirty (30) days to inquiries and complaints received from citizens and, as appropriate, prepare written responses to comments, inquiries or complaints received from such citizens.

**NOTICE OF PUBLIC HEARING
FY 2001 CONSOLIDATED PLAN FOR FUNDING**

**INDIANA DEPARTMENT OF COMMERCE
INDIANA HOUSING FINANCE AUTHORITY
INDIANA FAMILY AND SOCIAL SERVICES ADMINISTRATION
INDIANA DEPARTMENT OF HEALTH**

Pursuant to 24 CFR Part 91.115(a)(2), the State of Indiana wishes to encourage citizens to participate in the development of the State of Indiana Consolidated Plan for 2001. In accordance with this regulation, the State is providing the opportunity for citizens to comment on the 2001 Consolidated Plan Update draft report, which will be submitted to the US Department of Housing and Urban Development (HUD) on or before May 15, 2001. The Consolidated Plan defines the funding sources for the State of Indiana's four (4) major HUD-funded programs and provides communities a framework for defining comprehensive development planning. The FY 2001 Consolidated Plan will set forth the method of distribution of funding for the following state agencies and HUD-funded programs:

**Indiana Department of Commerce - State Community Development Block Grant (CDBG) Program
Indiana Housing Finance Authority - Home Investment Partnership Program
Indiana Family and Social Services Administration - Emergency Shelter Grant Program
Indiana Department of Health - Housing Opportunities for Persons With Aids Program**

These public hearings will be conducted as follows:

INSERT INFORMATION HERE

If you are unable to attend the public hearings, written comments are invited through April 30, 2001, at the following address:

**Grants Management Office
Indiana Department of Commerce
One North Capitol - Suite 700
Indianapolis, IN 46204-2288**

Please direct all questions to the Grants Management Office of the Department of Commerce at its toll free telephone number (800-246-7064) during normal business hours.

ESG Allocation Plan

TO: Emergency Shelter and Domestic Violence Providers

FROM: Joan M. Cochran, Section Manager

THROUGH: Thurl B. Snell, Deputy Director

DATE: January 10, 2001

SUBJECT: 2001 - 2002 Emergency Shelter and Violence Funding Applications

We are pleased to provide the combined Emergency Shelter, (ESG) Domestic Violence and Sexual Assault application packet. Renitra Moore-Marion, ESG Program Specialist, and Lena Harris, Program Specialist, have worked vigorously on refining and shortening the application process.

Each year the Division of Family and Children (DFC) awards funds to agencies statewide providing Emergency Shelter Grant (ESG) services (including transitional housing) and/or Family Violence programs. The programs combined in this packet are Emergency Shelter (0306); Social Service Block Grant (0600); Domestic Violence Prevention and Treatment (0640); Federal Family Violence Services (0620); and Sexual Assault Services (0900). We do hope you find this process more efficient.

Before your submission, please note the following:

1. Agencies may apply for any or all ESG/Violence funding they are qualified to administer.
2. The application format has been updated. Please read each question carefully and answer as fully as possible.
3. All sections for which you are applying must be fully completed. Incomplete answers or missing documents will result in a reduction of the application's score.
4. Please be advised that certain items must be included in the application. Each application will be evaluated and scored by no less than two members of the Review Committee. The scores will be averaged and funding awards will be based on the averaged scores. **A minimum score of 70 is required to receive funding.**

5. Each program section is designated by a different color: ESG, Section 1 – Blue; Social Service Block Grant, Section 2 – Beige; DVPT, Section 3 – Pink; Federal Family Violence, Section 4 – Yellow; and Sexual Assault Services, Section 5 – Green. ***Only complete and return those sections where funds are being requested. Pages are to be sequentially numbered. Sections are to be tabbed. Proposals are to be submitted in a file folder.***
6. Please read carefully the “Description of Grants and Funding Opportunities” section. These service descriptions detail the programs that an agency must provide in order to apply for funding.
7. ESG funds are awarded on a statewide competitive basis. **ESG awards will have a maximum of \$50,000 and a minimum of \$10,000.**
8. ESG funds will only be awarded to organizations that provide actual shelter for the homeless. This includes day shelters.
9. The Secretary of State’s Certificate of Existence must be in the agency’s legal, incorporated name, ***not doing business as.*** This will expedite the application process and assist in ensuring you receive your grant timely.
10. All Funded Programs are ***required*** to have Internet access by July 01, 2001. This will facilitate the mandatory reporting of statistics and demographics to federal funding sources.

Staff will be offering an opportunity for training on the application process on February 1, 2001, in the Government Center South Auditorium. Please contact Ms. Moore-Marion if you plan on attending at 800.341.3614, extension 7117.

The application deadline is Monday, March 5, 2001. Applications received after 4:30 p.m. on that date, faxed proposals, or incomplete submissions will **NOT** be considered.

Please submit one original application and one copy to the attention of:

**PATRICIA LANE
DIVISION OF FAMILY AND CHILDREN
HOUSING AND COMMUNITY SERVICES SECTION
402 W. WASHINGTON ST., ROOM W 381
P. O. BOX 6116
INDIANAPOLIS, IN 46206-6116**

Should you have any questions regarding the ESG or the family violence applications, the process, or procedures, please contact Renitra Moore-Marion, ESG Program Specialist, at 317.232.7117, or Lena Harris, Family Violence Program Specialist, at 317.232.4241. They can also be reached toll free at 1.800.641.3614, extension 7117 or extension 4241. We look forward to your participation in this process.

Cc: James M. Hmurovich
DFC Regional Managers
DFC Deputy Directors (Letter Only)
HCSS Staff (Letter Only)
Local Offices of the Division of Family and Children (Letter Only)

**FAMILY AND SOCIAL SERVICES ADMINISTRATION
DIVISION OF FAMILY AND CHILDREN
Housing and Community Services Section**

EMERGENCY SHELTER AND VIOLENCE PROGRAMS

**FY 2002
APPLICATION FOR FUNDS
COVER PAGE**

Contact Information

Emergency Shelter

Renitra Moore-Marion
Housing and Community Services
P.O. 6116
402 W. Washington St.
Indianapolis, Indiana 46206
317.232.7117
800.341.3614, ext. 7117
rmoore-marion@fssa.state.in.us

Domestic Violence

Lena Harris
Housing and Community Services
P.O. Box 6116
402 W. Washington St.
Indianapolis, Indiana 46206
317.232.4241
800.341.3614, ext. 4241
lharris@fssa.state.in.us

Please check which application(s) you are completing:

_____ESG (0306) _____SSBG (0600) _____DVPT (0640)
_____FFV (0620) _____SOS (0900)

(Required Information for all Proposals)

Agency's Legal Name:	Agency Mailing Address, including City/State/Zip:
Is agency's mailing address confidential? Yes No	Federal ID/Employer ID:
Agency CEO/Executive Director:	Agency Program Director:
Agency Physical Address, including City/State/Zip	Is agency's physical address confidential? Yes No
Telephone: () FAX: () Email:	Principal counties your project serves:
Please circle the most accurate description of your agency: non-profit for-profit county city town educational institution	Has this agency ever contracted with any other division of the Family and Social Services Administration? (If yes, please specify which Division.) Yes No

GENERAL INSTRUCTIONS

- Completed applications for Emergency Shelter and Violence funding from the Division of Family and Children, for fiscal year FY'2002 must be received by the Division of Family and Children at the address below by **4:30 PM (EST) on Monday, March 5, 2001.** Materials received after the deadline or apart from the application are ineligible for funding and will not be considered. Faxed copies will not be accepted for funding. The Division of Family and Children will review and make all decisions on funding. For acknowledgment that the proposal has been received, include a self-addressed stamped postcard that will be mailed to the applicant when the proposal is received. **A copy of the application is available on disk upon request.**
- Applications may be mailed to or dropped off in person to following address:
**PATRICIA LANE
DIVISION OF FAMILY AND CHILDREN
HOUSING AND COMMUNITY SERVICES SECTION
402 W. WASHINGTON ST., ROOM W 381
P. O. BOX 6116
INDIANAPOLIS, IN 46206-6116**

Application materials delivered to any other address will not be considered.

- Applications must be consistent with the service description and comply with requirements contained in this notice of grant availability.
- Submit **one (1) original and one copy** of the application. The original must be signed in **blue** ink. Applications will not be accepted through email.
- The application must be typed (no smaller than 12 pitch) and single-spaced. **Each page must be numbered sequentially beginning with the Cover Sheet. Sections are to be tabbed. Proposals are to be submitted in a file folder.**
- Certain sections of the narrative have **page limits**, which must not be exceeded.
- The application must follow the format and order presented herein. The forms provided with this notice **must be** utilized in completing the application, but may be reproduced on your computer.
- **The application will not be reviewed if all required documents (e.g. Certificate of Existence, Board Member Information, budget, etc.) are not submitted.**
- Do not send in, attach, or include any pamphlets, publications, or brochures with your grant application.
- Refer to the Unallowable Expenses Section when preparing program budget forms.

DESCRIPTION OF GRANTS AND FUNDING OPPORTUNITIES

This section provides information regarding each grant available for application. If your agency is applying for the grant listed, please indicate that you wish to apply by marking Yes. If you are not applying, mark No and move to the next section. If you are applying, complete the funding questions. If there is a required match, it should be included in the total project costs.

Each grant opportunity has a color-coded section within this application packet. If your agency indicates that it is applying for a grant, the corresponding color-coded section for that grant must be completed. If you are not applying for a grant, please do not complete the color-coded section for that grant.

SERVICE DESCRIPTIONS

EMERGENCY SHELTER GRANT (0306) Section 1, Blue – The program is designed to help improve the quality of existing emergency shelters for homeless people, to help make available additional emergency shelter space, to help meet the costs of operating shelters and of providing certain essential social services to homeless individuals and families. Homelessness is basically defined as an individual or family who lacks a fixed, regular, and adequate nighttime residence. Thus, persons will have access not only to safe and sanitary shelter, but also the supportive services and other kinds of assistance needed to improve their lives. Further, the program is also intended to restrict the increase of homelessness through the funding of preventive programs and activities. **100% match is required for this grant.**

Apply for: YES NO

(If yes, complete **Blue** section of application packet)

ESG dollars requested: \$_____

ESG Match funds: \$_____

Total Project Cost: \$_____

SERVICE DESCRIPTIONS

SOCIAL SERVICE BLOCK GRANT (0600) Section 2, Beige – Comprehensive Residential Services to victims of domestic violence will be purchased from facilities that have been providing this service for two years and have been reviewed and found in compliance with the State Standards for Domestic Violence Shelters. Victims of family violence are persons who have experienced or who believe they are in danger of experiencing abuse caused by a spouse, ex-spouse, partner, other family members or persons in a shared domicile. Service is intended to be short-term for emergency and crisis situations and are not to exceed forty-five days per incident. Comprehensive Residential Services provides temporary shelter and meals, 24-hour crisis intervention, case work services and emergency/essential transportation for victims of family violence and their dependent children. **No match is required.**

Apply for: YES NO

(If yes, complete **Beige** section of application packet)

SSBG dollars requested: \$_____

Total Project Cost: \$_____

SERVICE DESCRIPTIONS

DOMESTIC VIOLENCE PREVENTION AND TREATMENT FUND (DVPT) Section 3, Pink -

The goal for DVPT service is to prevent or remedy abuse, neglect, or exploitation of victims of domestic violence. Victims of domestic violence are defined as those who have experienced or believe themselves to be in danger of experiencing abuse caused by a spouse, ex-spouse, partner, other family member or person in a shared domicile. Comprehensive Residential Services provides for victims of domestic violence (18 years or older) and their dependent children, in residence at a shelter. Services are intended to be short-term for emergency and crisis situations and are generally limited to 45 days per client episode from point of intervention. Non-Residential Services provides for victims of domestic violence to receive counseling and supportive services without being in-residence at a DV shelter. **A match of 25% is required.**

Apply for: YES NO

(If yes, complete **Pink** section of application packet)

DVPT dollars requested: \$_____

DVPT Match funds: \$_____

Total Project Cost: \$_____

SERVICE DESCRIPTIONS

FEDERAL FAMILY VIOLENCE SERVICES (0620) Section 4, Yellow – This service is to assist in establishing, maintaining and expanding programs and projects to prevent family violence and to provide immediate shelter and other related assistance for victims of violence; information and referral and victim advocacy services in the areas of health cases, social and mental health services, family counseling, job training and employment opportunities, legal assistance and counseling for victims and their children. **If an existing grantee, a 20% match is required for this grant. If your agency is a new grantee, then a match of 35% is required.**

Apply for: YES NO

(If yes, complete **Yellow** section of this application packet)

Family Violence funds requested: \$_____

Family Violence Match funds: \$_____

Total Project Cost: \$_____

SERVICE DESCRIPTIONS

SEXUAL ASSAULT SERVICES (0900) Section 5, Green – This program utilizes funds for preventive health service program activities consistent with making progress toward achieving the directives established for the health status of the population for the year 2002. Program guidelines allow for services to victims of sex offenses and for the prevention of sex offenses, especially rape. The program provides for planning, administration and educational activities related to the project. Program funds may also be used for monitoring, evaluation, and start-up for performance activities to prevent diseases and improve the health status of citizens. **No match is required.**

Priorities:

- 1) Identify at-risk potential for sexual assault victims with focus on housing communities and high-risk crime areas.
- 2) Develop unserved and undeserved areas to make services available.
- 3) Outreach to minority populations by providing educational programs regarding reporting, availability of services and prevention education programs.
- 4) Develop a place to educate male sex offenders under the age of thirty.

Apply for: YES NO

(If yes, complete **Green** section of application packet)

Sexual Assault Services dollars requested: \$ _____

Total Project Cost: \$ _____

COMMON INFORMATION SECTION

PLEASE ATTACH THE FOLLOWING INFORMATION.

- Overall description of agency – A description of your agency that should provide a reviewer with a clear, concise overview of your organization. By reading this description, a reviewer should understand the purpose of your agency, mission, goals, major programs, projects and accomplishments, certifications, services provided, targeted population you serve, etc. (Not to exceed one page)
- History of agency (Not to exceed one page)
- List of current board members (Form enclosed)
- Most recent agency organization chart
- Articles of Incorporation
- Secretary of State Certificate of Existence (Must be current)
- Agency Rules and Termination Policy, where applicable.
- A copy of current fire inspection and health department inspection. (Facilities only)
- Letters of support: One from the local Office of Division of Family and Children, (from no less than three (3) counties of operation) plus two additional letters or Memorandums of Understanding from social service providers (i.e. community action agencies, churches, hospitals, schools, mental health facilities, etc.)

CERTIFICATES OF INSURANCE AND BONDING

Attach a copy of the Insurance Declaration Page indicating the current amount of coverage:

1. General Liability (minimum coverage: if your agency receives ESG funding the minimum is \$500,000. If your agency receives DV funding **only**, the minimum is \$300,000).
2. Automobile Liability (must include non-owned vehicles)
3. Workmen's Compensation and Unemployment Compensation
4. Bond of insurance coverage for all persons who will be handling funds in an amount equal to one-half (1/2) of the total annual funding provided by the State or \$250,000, whichever is less
5. Coverage for losses due to fire, flood, and natural disasters.

TOTAL AGENCY BUDGET

Attach a copy of your organization's current budget. (Total agency)

FINANCIAL STATEMENTS

Attach a copy of your organization's most recently completed year-end financial statements. (Annual or Fiscal Year-End, Audited if Applicable)

CERTIFICATION STATEMENT AND SIGNATURE: Please complete the enclosed form certifying that authority has been given for the agency to apply for funding. (Form enclosed)

BOARD MEMBER INFORMATION
DUPLICATE FORM AS NECESSARY

ORGANIZATION: _____									
MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
GROUP REPRESENTED: _____									
MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
GROUP REPRESENTED: _____									
MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
GROUP REPRESENTED: _____									
MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
GROUP REPRESENTED: _____									
MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
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MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
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MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
GROUP REPRESENTED: _____									

BOARD MEMBER INFORMATION
DUPLICATE FORM AS NECESSARY

ORGANIZATION: _____									
MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
GROUP REPRESENTED: _____									
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TERM BEGAN: _____					TERM ENDS: _____				
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MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
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MEMBER: _____					POSITION: _____				
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TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
GROUP REPRESENTED: _____									
MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
GROUP REPRESENTED: _____									
MEMBER: _____					POSITION: _____				
MAILING ADDRESS: _____									
TERM BEGAN: _____					TERM ENDS: _____				
COUNTY REPRESENTED: _____					PHONE: _____				
GROUP REPRESENTED: _____									

CERTIFICATION STATEMENT AND SIGNATURE

Grantee Name:

In order for your agency to be considered for a contract, the following certification Statement must be SIGNED BY THE INDIVIDUAL AFFILIATED WITH YOUR AGENCY WHO IS AUTHORIZED (in your by-laws) TO SIGN YOUR CONTRACT.

This certification must be submitted with all proposal materials.

I have read the request for proposal materials and understand the Intent, Limitations, and Requirements of services purchased through this proposal and the Contractual requirements of the State.

I hereby certify that all program information in the program proposal forms is true and correct and accurately reflects the agency's program. I understand and will comply with the programmatic contractual requirement placed upon this agency if we are awarded a contract.

I hereby certify that the FY'02 Projected Budget page completed for this agency is true and accurately reflects the agency's projected cost of service delivery. I certify that no collusion has contractual requirements placed upon the agency, if we are awarded a contract.

Signature:

Name: (typed or printed)

Title:

Agency's Legal Name:

Date:

UNALLOWABLE EXPENSES

Unallowable expenses include, but may not be limited to the following:

Advertising

Advertising other than for recruitment of personnel or volunteers or for specialized materials is not allowable.

Bad Debt

Bad debt expense is not an allowable expense.

Capital Expenditures

The cost of any capital purchase of \$5000 or more is not allowed as an expense except through yearly depreciation unless the provider has prior written approval from the Indiana Division of Family and Children.

Client Wages

Wages paid by the provider to recipients of purchased services should be offset by program income and are not allowable as expense.

Contingencies or Reserve Funds

Funds reserved for specific or unforeseen future expenses are not allowable as expenses for purchased services.

Contributions

Contributions or donations made by providers to others are not allowable expenses for purchased services or grants.

Depreciation on Assets Purchased with Federal or State Funds

Depreciation on building or equipment furnished by the federal government, purchased through federal grants or by state monies is not an allowable expense.

Entertainment Cost

Cost of entertainment, meals, diversions and ceremonials are not allowable expenses.

Expenses Offset by Other Federal Revenue

Expenses allocated to other federal programs are not allowable expenses.

Fines and Penalties

Fines and penalties are not allowable as expenses for purchased services.

Fund Raising Costs

Costs incurred for fund raising should be offset by fund raising revenue and are not allowable as expenses.

In-Kind Expenses

In-Kind expenses recorded to recognize the value of donated space, goods, and services are not allowable as service or grant expenses, but may qualify as required match.

Legal Expenses

Legal expenses not directly benefiting purchased services are not allowable expenses.

Interest Expense

Interest expense is not an allowable expense.

Contract Supplies

Supplies used in the production of goods to be sold should be offset by program income and are not allowable as expenses.

Moving Costs

The provider's cost of moving is not an allowable expense.

Organization Costs

The provider's cost of organizing or reorganizing as a legal entity are not allowable as expenses.

Taxes

Taxes for which the provider could be exempted are not allowable as expenses. Related penalties from prior years are not allowable as expenses.

SECTION 1 - BLUE

EMERGENCY SHELTER GRANT

FUNDING APPLICATION

(0306)

JULY 1, 2001 THROUGH JUNE 30, 2002

EMERGENCY SHELTER GRANT
APPLICATION INSTRUCTIONS

SECTION PROPOSAL PAGE LIMIT: Seven pages, including program narrative information, financial narrative and certification of local approval for nonprofit organizations.

Emergency Shelter funds may be used for:

1. **Essential Services:** Such services include, but are not limited to, those concerned with employment, health, substance abuse, education, child care, transportation, assistance in obtaining other federal, state, and local assistance, and assistance in obtaining permanent housing. Staff salaries that provide direct case management services necessary to offer such services are allowable costs.
2. **Shelter Operating Costs:** These costs include rent, utilities, essential equipment, supplies, insurance, and administrative staff costs, (which do not provide direct client services).
3. **Homeless Prevention Activities:** These activities include, but are not limited to, short term subsidies to defray rent and utility arrearages, security deposits or first month's rent, landlord mediation programs, legal services for indigent tenants, payments to prevent home foreclosure, and other innovative programs and activities designed to prevent the incidence of homelessness.

Program Narrative: The Emergency Shelter program narrative section must contain the following components:

- ❑ **Abstract:** This section should clearly and concisely summarize the ESG program request.
- ❑ **Needs Statement:** This section documents the needs to be met or problems to be solved by the proposed project. The Needs Statement should provide data that supports the need in the applicant's proposed service area. It should outline the coordination of services in the area and the agency's involvement in the area's continuum of care. This section should answer the following questions:
 1. Identify whom the program will serve including factors that characterize the population.
 2. Where is this population located geographically?
 3. How will the identified population be referred or directed to your program?

This section should contain necessary statistics to demonstrate relevant physical, economic, social, financial, institutional, or other problems.

- ❑ **Objectives:** This section should outline the primary measurable objectives of this project on which evaluation will be based. The Objectives are the "outcomes" of your activities. Objectives should: (1) Tell who (2) is going to do what (3) when (4) how much and (5) how you will measure it.
- ❑ **Action Plan:** This section should describe the activities to be employed to achieve the desired results. The Action Plan describes the steps to be taken and should flow from the objectives. Actions should be understandable, clear and accompanied by an

explanation of the rationale underlying your choice of method. The Action Plan should describe staffing, clients and time frames.

- **Evaluation:** This section presents your plan for determining the degree to which objectives are met and action plans are followed. The Evaluation should determine the extent to which the program has achieved its stated objectives. The section should explain who will be performing evaluation activities, define evaluation criteria, explain methods for gathering data, describe tools and instruments used in evaluation, and describe how evaluation will be used to improve the program.

Financial Narrative: **(Use enclosed form and See attached instructions)** This Financial Narrative is for the Emergency Shelter Grant program only. Do not include the entire budget for your agency. Indicate on any or all of the line items the amount you propose to spend in those areas. The instructions for completing the Financial Narrative are located on the back of the form. Under Operations, Shelter Staff is the salary for personnel that actually operate the shelter and can not exceed 10% of the total funding award. Equipment Costs are for purchases that **exceed** \$5,000 per unit, i.e. if a computer is purchased for \$2,000 it is **not** equipment, it is noted under Office Supplies. The Financial Narrative is completed for the amount of Emergency Shelter funds you are requesting. After the proposal review and awards are announced, an Emergency Shelter Grant **Budget Form** will be mailed along with the contract agreement. The budget form should be completed using the revised funding amount.

ESG Certification of Local Approval for Nonprofit Organizations: (Signed by a local elected official). Use the attached form. This form is a **required document** for receiving ESG funding.

INDIANA FAMILY AND SOCIAL SERVICES ADMINISTRATION
HOUSING AND COMMUNITY SERVICES SECTION
Emergency Shelter Grant
FINANCIAL NARRATIVE

DATE	GRANTEE NAME	GRANT YEAR	FEDERAL ID#
BUDGET PERIOD 6000/114100		THRU	SERVICE CODE: 0306
ESSENTIAL SERVICES			
CHILD CARE	\$ _____	JOB TRAINING	\$ _____
CLOTHING	\$ _____	MEDICAL/DENTAL	\$ _____
EDUCATION	\$ _____	SUPPORTIVE TRANSPORT	\$ _____
FOOD PANTRY	\$ _____	OTHER COSTS	\$ _____
HOUSING PLACEMENT	\$ _____	SUBTOTAL	\$ _____
OTHER COSTS (Specify) _____			

OPERATIONS			
SHELTER STAFF		(NO MORE THAN 10% OF AWARD)	
BLDG./GROUND MAINT	\$ _____	POSTAGE	\$ _____
CLEANING SUPPLIES	\$ _____	RENT	\$ _____
COMMERCIAL SPACE	\$ _____	SHELTER SUPPLIES	\$ _____
ELECTRIC	\$ _____	TELEPHONE - OFFICE	\$ _____
EQUIPMENT	\$ _____	TELEPHONE - SHELTER	\$ _____
FOOD/COOKING	\$ _____	TOILETRY ITEMS	\$ _____
GAS	\$ _____	TRASH REMOVAL	\$ _____
INSURANCE	\$ _____	WATER/SEWAGE	\$ _____
OFFICE SUPPLIES	\$ _____	OTHER COSTS	\$ _____
		SUBTOTAL	\$ _____
EQUIPMENT AND OTHER COSTS (Specify) _____			

HOMELESS PREVENTION			
LANDLORD/MEDICATION	\$ _____	SECURITY DEPOSITS	\$ _____
LEGAL SERVICES	\$ _____	UTILITY ASSISTANCE	\$ _____
RENT/MORT. ASSISTANCE	\$ _____	OTHER COSTS	\$ _____
		SUBTOTAL	\$ _____
OTHER COSTS (SPECIFY) _____			

TOTAL			

**INDIANA FAMILY AND SOCIAL SERVICES
HOUSING AND COMMUNITY SERVICES SECTION
EMERGENCY SHELTER GRANT FINANCIAL NARRATIVE INSTRUCTIONS**

Please type.

GRANTEE NAME - Enter in agency's name as registered with the Secretary of State's Office.

AGREEMENT NUMBER - This is the number located at the top of first page of the ESG Agreement. The number is made up of four parts - county number - fiscal year - account code - provider #, i.e. 02-6-09-999. Enter the number in this block.

FEDERAL ID - Enter the agency's nine digit federal identification number.

ESSENTIAL SERVICES - Enter by item the amount spent in this line item. Enter the total on the budget summary. Specify any Other Costs. Note: Supportive Transport is transport of the client so that the client may receive support services.

OPERATIONS - Enter by item the amount spent in this line item. Enter the total amount on the budget summary. Specify any Equipment Purchases and Other Costs. Note: Staff includes person(s) that actually operate the shelter (this amount cannot exceed lot of the total award) Telephone - Shelter is the phone located in the shelter for shelter staff or clients; Telephone - Office is the phone for the shelter's administrator; Shelter Supplies includes bedding, linens, towels, etc.; Cleaning Supplies are for the shelter only; Toiletries are those personal hygiene items given to clients; Food/Cooking includes food stuffs and cooking supplies such as pots and pans; Bldg./Ground Maintenance. is for the shelter only; Equipment is defined as those items with a unit cost greater the. \$5,000 and a life expectance of one or more years; Insurance; Commercial Space is the cost to put a client in temporary accommodations such as a hotel or other non-shelter site.

HOMELESS PREVENTION - Enter by item those costs for the provision of homeless prevention activities. Specify Other Costs.

EMERGENCY SHELTER GRANT PROGRAM

CERTIFICATION OF LOCAL APPROVAL FOR NONPROFIT ORGANIZATIONS

I, _____
Name and Title

duly authorized to act on behalf of the

Name of the Jurisdiction

Hereby approve the following project(s) proposed by

Name of Nonprofit

Which is (are) to be located in

Name of Jurisdiction

Comments: _____

By: _____
Typed Name and Title

Signature

Date

SECTION 2 - BEIGE

SOCIAL SERVICES BLOCK GRANT
Domestic Violence Services

(0600)

FUNDING APPLICATION

JULY 1, 2001 THROUGH JUNE 30, 2002

SOCIAL SERVICE BLOCK GRANT
APPLICATION INSTRUCTIONS

SECTION PROPOSAL PAGE LIMIT: Six pages, including program narrative information, budget and county/regional projections.

Service Description for 0600 SSBG:

I. Definition:

Comprehensive Residential Services to victims of domestic violence (0600) will be purchased from facilities that have been providing this service for two years and have been reviewed and found in compliance with the State Standards for Domestic Violence Shelters.

Victims of family violence are persons who have experienced or who believe they are in danger of experiencing abuse caused by a spouse, ex-spouse, partner, other family members or persons in a shared domicile.

Services are intended to be short-term for emergency and crisis situations and are not to exceed forty-five (45) days per incident. Comprehensive Residential Services (0600) provides temporary shelter and meals, 24-hour crisis intervention, case work services and emergency/essential transportation for victims of family violence and their dependent children.

II. Method of Purchase:

Unit Rate: (For definition of Unit Rate see IX. Components, A. Reporting and Billing.)

This service will be provided to victims of family violence and their dependent children, without regard to income, age, creed, sex, ethnicity, color, religion, national origin, ancestry, marital status, sexual preference or physical challenge.

III. Categories and Characteristics of Individuals To Be Served:

This service is for domestic violence victims and their children. Victims of domestic violence are those persons who have experienced or are in danger of experiencing abuse caused by a spouse, ex-spouse or surrogate spouse.

This service will be provided to victims of domestic violence and their children, without regard to income.

IV. Unit Rate Structure:

Rates will be certified on actual cost statements submitted by applicants. Unit rates will be awarded at a minimum of thirty-five dollars (\$35.00) and a maximum of fifty dollars (\$50.00).

V. Requirements and Restrictions:

A. Victims for whom services are billed must have a previous permanent Indiana address prior to admission to the shelter.

B. Support services are limited to the residents of the shelter and should include: Casework, case management, advocacy (for adults and children) and emergency/essential transportation for the provision of these services. **These services must be documented in the case file:**

1. Support/case management involves spending time with the recipient providing emotional support, collecting information for service delivery, developing a service plan for identifying goals, discussion of domestic violence issues, and linking clients to appropriate services.
2. Advocacy involves providing support for or on behalf of the recipient and the family, coordinating services, providing support group and may involve follow-up with the victim and other service providers working with the victim.
3. Twenty-four (24) hour crisis intervention shelters shall have a staff or trained volunteers available to respond to a crisis call 24 hours a day, seven days a week, 365 days a year.
4. When persons are in residence, the agency must document that staff or trained volunteers are on-site, dressed and fully awake, at all times.
5. Emergency transportation will be arranged in order to assist the victims in arriving at the shelter in a safe manner.
6. Essential transportation will be arranged in order to assist in providing community resources to the residents of the shelter.

C. Psychiatric or mental health evaluation cannot be mandated as a requirement for shelter services.

D. The need for the shelter must be clearly documented on the agency intake form. This documentation must clearly define the identified circumstances which led to the determination that the client experienced abuse or was in immediate danger of experiencing abuse, which led to the need for shelter.

VI. Statement of Goal:

The goal for 0600 service is to provide comprehensive residential services for victims of family violence.

VII. Allocation Methodology:

The funding formula for 0600 services developed utilizing shelter size and capacity, population and geographic demography, number of counties served, contract compliance, ancillary services, shelter utilization, unit rate and local cost of living.

VIII. Protocol:

Please see Allocation Methodology.

IX. Components:

A. Reporting and Billing

1. The Reporting and Billing unit is defined as: One (1) 24-hour day.
2. If an individual is in residence for less than 24 hours, a unit of service may be billed if an intake form is completed and on file.

3. In the case of a child turning 18 while in residence, continue to bill under the mother's name. Do not fill out a separate application form.

Program Narrative: The Social Services Block Grant program narrative section must contain the following components:

- ❑ Abstract: This section should clearly and concisely summarize the Social Service Block Grant program request.
- ❑ Needs Statement: This section documents the needs to be met or problems to be solved by the proposed project. The Needs Statement should provide data that supports the need in the applicant's proposed service area. It should outline the coordination of services in the area and the agency's involvement in the area's continuum of care. This section should answer the following questions:
 1. Identify whom the program will serve including factors that characterize the population.
 2. Where is this population located geographically?
 3. How will the identified population be referred or directed to your program?

This section should contain necessary statistics to demonstrate relevant physical, economic, social, financial, institutional, or other problems.

- ❑ Objectives: This section should outline the primary measurable objectives of this project on which evaluation will be based. The Objectives are the "outcomes" of your activities. Objectives should: (1) Tell who (2) is going to do what (3) when (4) how much and (5) how you will measure it.
- ❑ Action Plan: This section should describe the activities to be employed to achieve the desired results. The Action Plan describes the steps to be taken and should flow from the objectives. Actions should be understandable, clear and accompanied by an explanation of the rationale underlying your choice of method. The Action Plan should describe staffing, clients and time frames.
- ❑ Evaluation: This section presents your plan for determining the degree to which objectives are met and action plans are followed. The Evaluation should determine the extent to which the program has achieved its stated objectives. The section should explain who will be performing evaluation activities, define evaluation criteria, explain methods for gathering data, describe tools and instruments used in evaluation, and describe how evaluation will be used to improve the program.

Budget: **(Use enclosed form)**

Projected County and Regional Information: **(Use enclosed form)** Divide SSBG requested amount into counties to be served. Total should equal total SSBG funds requested.

PROJECTED BUDGET FISCAL YEAR 2002

SOCIAL SERVICES BLOCK GRANT

EXPENSE LINE ITEMS	Column A Total Program Costs	Column B Purchased Services SSBG	Column C Non-Purchased Services
(1) Personnel Services			
(2) Consultants/Contracted			
(3) Supplies			
(4) Occupancy			
(5) In-State Travel Costs			
(6) Out-of-State Travel Costs			
(7) Equipment			
(8) Other (Itemize below)**			
(9) Total Costs			
(10) Disallowance			
(11) Sub-Total Allowable Costs (10-11)			
(12) Total SSBG Funds Requested			
Service Unit Definition:	Projected Number of SSBG Units:	Service Unit Rate:	
		Actual Cost Per Unit	Unit Rate Requested
Shelter Bed Day			

****List Other Costs here or on back of BUDGET page**

[illegible]

SOCIAL SERVICES BLOCK GRANT
Projected County and Region Information

(Information provided must reflect projected services for July 1, 2001 through June 30, 2002.

COUNTIES SERVICED	DOLLARS PROJECTED	COUNTIES SERVICED	DOLLARS PROJECTED	COUNTIES SERVICED	DOLLARS PROJECTED
Benton		Boone		Clay	
Carroll		Clinton		Daviess	
Cass		Fountain		Dubois	
Fulton		Hamilton		Gibson	
Lake		Hendricks		Greene	
Jasper		Howard		Knox	
LaPorte		Johnson		Martin	
Marshall		Marion		Monroe	
Newton		Montgomery		Owen	
Porter		Morgan		Pike	
Pulaski		Parke		Posey	
St. Joseph		Putnam		Spencer	
Starke		Tippecanoe		Sullivan	
White		Tipton		Vanderburg	
NW Region Total:		Vermillion		Vigo	
Allen		Warren		Warrick	
Adams		WC Region Total:		SW Region Total:	
Blackford		Dearborn		Bartholomew	
Dekalb		Decatur		Brown	
Elkhart		Delaware		Clark	
Grant		Fayette		Crawford	
Huntington		Franklin		Floyd	
Kosciusko		Hancock		Harrison	
LaGrange		Henry		Jackson	
Miami		Jay		Jefferson	
Noble		Madison		Jennings	
Steuben		Ohio		Lawrence	
Wabash		Randolph		Orange	
Wells		Rush		Perry	
Whitley		Shelby		Ripley	
NE Region Total:		Union		Scott	
		Wayne		Switzerland	
		EC Region Total:		Washington	
				SE Region Total:	
Column Total:		Column Total:		Column Total:	
			Total Dollars Projected:		

SECTION 3 - PINK

**DOMESTIC VIOLENCE
PREVENTION AND TREATMENT**

FUNDING APPLICATION

(0640)

JULY 1, 2001 THROUGH JUNE 30, 2002

DOMESTIC VIOLENCE PREVENTION AND TREATMENT GRANT
APPLICATION INSTRUCTIONS

SECTION PROPOSAL PAGE LIMIT: Five pages, including program narrative information and budget.

Service Description (0640) DVPT:

Statement of Goal

The goal for Domestic Violence Prevention and Treatment (DVPT) service is to prevent or remedy abuse, neglect or exploitation of victims of domestic violence. Victims of domestic violence are defined as those who have experienced or believe themselves to be in danger of experiencing abuse caused by a spouse, ex-spouse, partner, other family member or person in a shared domicile.

Eligible Service Providers

Services will be purchased from agencies that have been providing the program components listed below for at least two years and have participated in a peer review, new agency review or contract management review and found to be in compliance with the state standards for domestic violence.

All eligible service providers must provide equal service opportunities without regard to income, age, creed, sex, ethnicity, color, religion, national origin, ancestry, marital status, sexual preference or physical challenge.

Service Components

Comprehensive Residential Services (0640S) provides for victims of domestic violence (18 years or older) and their dependent children, in residence at a shelter. Services are intended to be short-term for emergency and crisis situations and are generally limited to 45 days per client episode from point of intervention.

Non-residential Service (0640N) provides for victims of domestic violence not in residence at a shelter.

Program Components.

Grantees should provide at least two of the following:

- 24-hour information, referral and crisis intervention for domestic violence victims. This refers to the availability to respond to a crisis call 24-hours a day, seven days a week, 365 days a year.
- Support and/or educational groups for women and children who are domestic violence victims.
- Advocacy, ongoing support and follow-up assistance for domestic violence victims.
- Counseling/Case management services must be documented in individual case files and include providing emotional support, developing a service plan, identifying goals, discussing domestic violence issues and linking client to appropriate services.
- Emergency transportation will be arranged to assist victims arriving at the shelter safely. Essential transportation will be arranged in order to provide victims access to community resources.

- Training professionals (medical, legal, law enforcement) with regard to domestic violence issues.
- Community training and education programs with regard to domestic violence issues.

Unit Rate Structure/Fee Policy

Grants will be administered on a line item monthly reimbursement basis. An advance equal to one-half of the grant award may be allowed upon execution of contracts under \$50,000. Advances on contract over \$50,000 will be equal to one-sixth of the grant award. Approved actual expenses must be billed according to the following codes on 0640 DVPT claim form:

0640.1	Personnel Services
0640.2	Other Services
0640.3	Service by Contract
0640.4	Supplies
0640.5	Equipment
0640.6	Sub-contracted Programs
0640.7	In-state travel costs
0640.8	Out of state travel costs

Program Requirements for DVPT Services

- Services will be funded only in programs designed to develop and implement means for the prevention and treatment of domestic violence.
- Victims who receive services must be residents of Indiana.
- **Statistical records must be kept and submitted semi-annually to FSSA. Reports are due on July 1, 2001 with a narrative close report due no later than August 31, 2001. FSSA will supply the reporting forms and instructions.**
- Programs receiving grant awards for 24-hour information, referral and crisis intervention must document the number of telephone calls.
- Programs receiving grant awards for support and education groups must maintain records documenting group sessions. This documentation should include attendance sheets, an intake or enrollment form for each member, agenda for each session and a brief summary of major topics discussed. An unduplicated count of clients served, as well as client statistics, must also be maintained.

General Guidelines

1. Funding decisions will take into account factors outlined in the State Plan such as:
 - Staff
 - Cost effectiveness
 - Size of Service Area
 - Occupancy rate
 - Counties Served
 - Population demographics
 - Cultural Competence
2. Awards will be granted based on the availability of funds.
3. Applicant must have been in business for two years in order to apply for Domestic Violence funds.
4. Applicant must demonstrate a need for the service in the proposed geographic area.
5. Applicant must demonstrate:
 - Community support and networking

- Other funding capabilities and resources
 - Number of people served in comparison to population size
6. The applicant must meet the criteria outlined in the DVPT Law.
 7. Total funding to a program grantee will not exceed 75% of program cost.
 8. Under DVPT, no contract will be written for less than \$5,000 and the maximum will be \$50,000.
 9. Current grantees must be in contract compliance, be current with reporting requirements, and have a utilization rate of at least 70% at the time of the of the Executive Panel.

Funding Priorities

1. Domestic violence shelters will be given priority for DVPT funds.
2. Unserved and underserved areas and populations will be considered priorities
3. Funding consideration will be based upon:
 - Population served
 - Availability of services
 - Urban vs. Rural Factors
 - Occupancy rate
 - Compliance with application guidelines

Program Narrative: The Domestic Violence Prevention and Treatment program narrative section must contain the following components:

- Abstract: This section should clearly and concisely summarize the Domestic Violence Prevention and Treatment program request.
- Needs Statement: This section documents the needs to be met or problems to be solved by the proposed project. The Needs Statement should provide data that supports the need in the applicant's proposed service area. It should outline the coordination of services in the area and the agency's involvement in the area's continuum of care. This section should answer the following questions:
 1. Identify whom the program will serve including factors that characterize the population.
 2. Where is this population located geographically?
 3. How will the identified population be referred or directed to your program?

This section should contain necessary statistics to demonstrate relevant physical, economic, social, financial, institutional, or other problems.

- Objectives: This section should outline the primary measurable objectives of this project on which evaluation will be based. The objectives are the "outcomes" of your activities. Objectives should: (1) Tell who (2) is going to do what (3) when (4) how much and (5) how you will measure it.
- Action Plan: This section should describe the activities to be employed to achieve the desired results. The Action Plan describes the steps to be taken and should flow from the objectives. Actions should be understandable, clear and accompanied by an explanation of the rationale underlying your choice of method. The Action Plan should describe staffing, clients and time frames.

- **Evaluation:** This section presents your plan for determining the degree to which objectives are met and action plans are followed. The Evaluation should determine the extent to which the program has achieved its stated objectives. The section should explain who will be performing evaluation activities, define evaluation criteria, explain methods for gathering data, describe tools and instruments used in evaluation, and describe how evaluation will be used to improve the program.

Budget: (Use enclosed form)

PROJECTED BUDGET FISCAL YEAR 2002
DOMESTIC VIOLENCE PREVENTION/TREATMENT GRANT

EXPENSE LINE ITEMS	Column A Total Program Costs	Column B Purchased Services DVPT	Column C Non-Purchased Services
1. Personnel Services			
2. Other Services			
3. Service by Contract			
4. Supplies			
5. Equipment			
6. Sub-contracted Programs			
7. In-State Travel Costs			
8. Out-of-State Travel Costs			
9. Total Costs			
10. Disallowance			
11. Sub-Total Allowable Costs (10-11)			
12. Total DVPT Funds Requested			

****List Other Costs here or on back of BUDGET page**

[illegible]

SECTION 4 - YELLOW

FEDERAL FAMILY VIOLENCE

0620

FUNDING APPLICATION

OCTOBER 1, 2001 - SEPTEMBER 30, 2002

FEDERAL FAMILY VIOLENCE SERVICES GRANT
APPLICATION INSTRUCTIONS

SECTION PROPOSAL PAGE LIMIT: Seven pages, including program narrative information, budget and compliance statement.

Service Description (0620) FVPS:

Major Definition:

FVPS (0620) funds are to assist in establishing, maintaining and expanding programs and projects to prevent family violence and to provide immediate shelter and other related assistance for victims of violence; information and referral and victim advocacy services in the areas of health cases, social and mental health services, family counseling, job training and employment opportunities, legal assistance and counseling for victims and their children.

The target population of these services are directed to the following populations:

- Under served and unserved populations
- Elderly victims
- Migrant workers
- Male victims

Method of Purchase:

Actual Cost

Characteristics of Individuals Served:

Services are provided to victims of family violence. This includes any family member who is threatened by an act of violence, which could result in injury. These services are also available for the elderly, victims, and their children.

Unit Rate Structure/Fees Policy:

Those contracts, which do not exceed \$50,000, may receive an advance equal to one-half of the grant award upon execution of the contract. Approved actual expenses must be billed according to the following add on codes for 0620 claims:

♦ 06205.ADV	Advance	\$1.00
♦ 06205.1	Personnel Services	\$1.00
♦ 06205.2	Other Services	\$1.00
♦ 06205.3	Services by Contract	\$1.00
♦ 06205.4	Supplies	\$1.00
♦ 06205.5	Equipment	\$1.00
♦ 06205.6	Building Land	\$1.00
♦ 06205.7	Indirect	\$1.00

Statement of Goals:

To assist in establishing, maintaining and expanding comprehensive shelter services, community education, and training to service providers. To enhance programs for children and provide adequate services for their care. Provide awareness campaigns and violence prevention and counseling to abusers in order to break the cycle of violence.

Program Narrative: The Federal Family Violence Services program narrative section must contain the following components:

- ❑ Abstract: This section should clearly and concisely summarize the Federal Family Violence Services program request.
- ❑ Needs Statement: This section documents the needs to be met or problems to be solved by the proposed project. The Needs Statement should provide data that supports the need in the applicant's proposed service area. It should outline the coordination of services in the area and the agency's involvement in the area's continuum of care. This section should answer the following questions:
 4. Identify whom the program will serve including factors that characterize the population.
 5. Where is this population located geographically?
 6. How will the identified population be referred or directed to your program?

This section should contain necessary statistics to demonstrate relevant physical, economic, social, financial, institutional, or other problems.

- ❑ Objectives: This section should outline the primary measurable objectives of this project on which an evaluation will be based. The objectives are the "outcomes" of your activities. Objectives should: (1) Tell who (2) is going to do what (3) when (4) how much and (5) how you will measure it.
- ❑ Action Plan: This section should describe the activities to be employed to achieve the desired results. The Action Plan describes the steps to be taken and should flow from the objectives. Actions should be understandable, clear and accompanied by an explanation of the rationale underlying your choice of method. The Action Plan should describe staffing, clients and time frames.
- ❑ Evaluation: This section presents your plan for determining the degree to which objectives are met and action plans are followed. The Evaluation should determine the extent to which the program has achieved its stated objectives. The section should explain who will be performing evaluation activities, define evaluation criteria, explain methods for gathering data, describe tools and instruments used in evaluation, and describe how evaluation will be used to improve the program.

Budget: **(Use enclosed form)**

Compliance Statements: **(Use enclosed forms)**

Federal Family Violence Compliance Issues

1. Grant funds will not be used for direct payments to any victim or dependent of a victim of family violence.

Will Comply

Cannot Comply

2. No income eligibility standard will be imposed on individuals receiving assistance or service supported with these funds.

Will Comply

Cannot Comply

3. No fee will be charged for services received under this grant.

Will Comply

Cannot Comply

4. The organization will not discriminate against applicants, recipients or potential or actual employees in regard to age, sex, race, color, religion, national origin, sexual orientation, or handicap.

Will Comply

Cannot Comply

5. Confidentiality of records pertaining to persons receiving assistance or services will be assured.

Will Comply

Cannot Comply

6. The address or location of any shelter/facility will not be made public, except with the written authorization of the person or persons responsible for the operation of the agency.

Will Comply

Cannot Comply

7. All books and records relative to service delivery and documentation will be retained and access permitted to persons authorized by the state for examination of the books, records and documents.

Will Comply

Cannot Comply

8. Financial books, records, and documents will be maintained. Generally acceptable accounting procedures and practices will be followed which sufficiently and properly reflect and allocate all direct and indirect costs for services provided. The state reserves the right to examine these financial books, records and documents.

Will Comply

Cannot Comply

Federal Family Violence Compliance Issues (continued)

9. The State will be held harmless against loss, liability, damages or expenses because of injury or damage.

Will Comply

Cannot Comply

10. Comply with the Drug-Free Workplace, Lobbying Activities and Debarment and Suspension clauses of the Contractual Agreement.

Will Comply

Cannot Comply

SECTION 5 - GREEN

SEXUAL ASSAULT SERVICES

(0900)

FUNDING APPLICATION

OCTOBER 1, 2001 – SEPTEMBER 30, 2002

SEXUAL ASSAULT SERVICES GRANT
APPLICATION INSTRUCTIONS

SECTION PROPOSAL PAGE LIMIT: Five pages, including program narrative information and budget.

Service Description (0900) Sexual Assault Services:

1. Funds may be used for:
 - Preventive health service program activities consistent with making progress toward achieving the directives established for the health status of the population for fiscal year 2002.
 - Providing services to victims of sex offenses and for the prevention of sex offenses, especially RAPE.
 - Related planning, administration and educational activities related to the projects funded.
 - Monitoring and evaluation related to the projects funded.
 - Start-up projects for performance of activities to prevent disease and improve the health status of citizens.
2. Funds may not be used for:
 - Providing inpatient services.
 - Making cash payments to intended recipients of health services.
 - Satisfying any requirements for the expenditure of non-Federal funds as a condition for the receipt of Federal funds.
 - Conferences and related activities, such as refreshments, promotional items, promotional activities, and/or accommodations.
 - Performance of activities not specific for disease prevention/health status improvements.
3. Priorities for FY 2002 are:
 - Educate male sex offenders under the age of 30 to prevent re-occurrence.
 - Fill the gaps of unmet services in unserved and underserved counties and increase services in these areas.
 - Enhance services to areas of high crime and minority population by providing education programs.
 - Reduce incidence of date rape through age appropriate educational programs presented to middle, high school, and college age youth through community and church groups, after school programs, and social organizations.

Program Narrative: The Sexual Assault Services program narrative section must contain the following components:

- ❑ **Abstract:** This section should clearly and concisely summarize the Sexual Assault Services program request.
- ❑ **Needs Statement:** This section documents the needs to be met or problems to be solved by the proposed project. The Needs Statement should provide data that supports the need in the applicant's proposed service area. It should outline the coordination of services in the area and the agency's involvement in the area's continuum of care. This section should answer the following questions:
 1. Identify whom the program will serve including factors that characterize the population.
 2. Where is this population located geographically?
 3. How will the identified population be referred or directed to your program?

This section should contain necessary statistics to demonstrate relevant physical, economic, social, financial, institutional, or other problems.

- ❑ **Objectives:** This section should outline the primary measurable objectives of this project on which evaluation will be based. The objectives are the "outcomes" of your activities. Objectives should: (1) Tell who (2) is going to do what (3) when (4) how much and (5) how you will measure it.
- ❑ **Action Plan:** This section should describe the activities to be employed to achieve the desired results. The Action Plan describes the steps to be taken and should flow from the objectives. Actions should be understandable, clear and accompanied by an explanation of the rationale underlying your choice of method. The Action Plan should describe staffing, clients and time frames.
- ❑ **Evaluation:** This section presents your plan for determining the degree to which objectives are met and action plans are followed. The Evaluation should determine the extent to which the program has achieved its stated objectives. The section should explain who will be performing evaluation activities, define evaluation criteria, explain methods for gathering data, describe tools and instruments used in evaluation, and describe how evaluation will be used to improve the program.

Budget: (Use enclosed form)

PROJECTED BUDGET FISCAL YEAR 2002
SEXUAL ASSAULT SERVICES GRANT

EXPENSE LINE ITEMS	Column A Total Program Costs	Column B Purchased Services SOS	Column C Non-Purchased Services
1. Personnel			
2. Consultant/Contractual			
3. Space Cost			
4. Consumable Supplies			
5. Travel			
6. Telephone			
7. Non-Consumable Supplies			
8. Program Related Expenses			
9. Other Costs			
10. Total Costs			
11. Disallowance			
12. Sub-Total Allowable Costs (10-11)			
13. Total SOS Funds Requested			

****List Other Costs here or on back of BUDGET page**

[illegible]

REVIEW FOR APPLICATION OF FUNDS

Agency _____

Date _____

Reviewer _____

Each agency's application will be reviewed by 2 members of the Review Committee. Two members of the team will review each agency application. The resulting two scores will be averaged and acceptance or rejection of the application will be based on the average. Reviewers complete General Application Requirements Section and Section One of review for all agency applications. Additional sections will vary depending on the programs for which an agency is applying.

GENERAL APPLICATION REQUIREMENTS AND GENERAL INFORMATION

1. Application submitted by 4:30 p.m. on March 5, 2001?
2. Submitted original (signed in blue ink) and 1 copy?
3. Application is typed in the requested format - font size is at least "12", lines are single spaced and pages are numbered?
4. Sections are tabbed and the proposal is submitted in a file folder?
5. All required sections are submitted?
6. Application does **NOT** include pamphlets, publications or brochures?
7. Agency information completed?

Yes	No

SECTION ONE

All agencies should read and complete the Service Description for the grant that they are applying for. Reviewers should check only those grants in which the agencies are applying, by checking yes or no if the corresponding section is enclosed and completed.

Emergency Shelter Grant (Blue Section)

1. Agency has noted amount requested
2. Match funds (100% required)
3. Total project cost included

Yes	No

Domestic Violence Prevention and Treatment (Pink Section)

1. Agency has noted amount requested
2. Match funds (25% required)
3. Total project cost

Yes	No

Social Services Block Grant (Beige Section)

1. Agency has noted amount requested
2. Total project cost

Yes	No

Federal Family Violence (Yellow Section)

1. Agency has noted amount requested
2. Match funds (20% for existing grantees; 35% required for new grantees)
3. Total project cost

Yes	No

Sexual Offense Services (Green Section)

1. Agency has noted amount requested
2. Total project cost

Yes	No

SECTION TWO - Common Information

All agencies must provide the requested information!

A. Overall Description of Agency

- a. Within one-page limit?
- b. Provides the purpose, mission, goal, major programs and major projects and accomplishments of the agency?

Yes	No

B. Applicant should provide the following

- History of the facility (not to exceed one page)
- Current board members listed (forms provided)
- Current organization chart
- Articles of Incorporation
- Current Secretary of State Certificate of Existence
- Agency Rules and Termination Policy, where applicable
- Copy of current fire and health department inspections
- Three letters of support (One from the Office of DFC from each county of operation; plus two letters or Memorandums of Understanding from social service providers)
- ESG Certification of Local Approval (ESG Receipts only).

C. Certificates of Insurance and Bonding

- A complete copy of the Insurance Declaration Page is attached?
- (ESG only) General Liability is the minimum or above \$500,000?
- (DV only) General Liability is the minimum or above \$300,000?
- (ESG only) Automobile liability is for non-owned vehicles?
- Coverage is for losses due to fire, flood and natural disasters?

Yes	No

D. Facility Funding Summary

Applicant should contain the following forms.

- Revenue Sources
- Operational Budget of Agency
- Agencies completed year end financial statements?
(Annual or Fiscal year-end, audited if applicable)

Yes	No

E. Certification Statement and Signature

- form enclosed and complete

Yes	No
Pass	Fail

Proposal Rating (Pass/Fail)

GRANT REVIEW ONE

Completed for all agencies applying for the Emergency Shelter Grant (BLUE SECTION)

Total Points Available 100

	MAX	SCORE
1. Proposal section does not exceed 7 pages (includes the Program and Financial Narrative and the Certification of Local Approval for Nonprofit Organizations)?	5	
2. Does the needs statement outline the coordination of services in the area and agency's involvement in the area's continuum of care?	25	
3. The objective of the activities do tell who is going to do what, when, how much and how it will be measured?	15	
4. The Financial Narrative form is typed and completed?	5	
5. The evaluation explains how it will be used to improve the program?	10	
6. The overall Program Narrative has the following information:		
- "Needs" to be met & problems to be solved by the project?	15	
- Contains necessary statistics to demonstrate relevant physical, economic, social, financial, institutional or other problems?	25	
Total	100	

COMMENTS: Grant Review One - Emergency Shelter Grant (ESG)

GRANT REVIEW TWO

Complete for all agencies applying for the Social Services Block Grant (BEIGE SECTION)

Total Points Available 100

	Max	Score
1. Proposal section does not exceed 6 pages (includes the Program and Financial Narrative and the Certification of Local Approval for Nonprofit Organizations)?	5	
2. Program Narrative has the following information:		
- "Needs" to be met & problems to be solved by the project?	15	
- Contains necessary statistics to demonstrate relevant physical, economic, social, financial, institutional or other problems?	25	
- The objective of the activities do tell who is going to do what, when, how much and how it will be measured?	15	
- The Needs Statement outlines the coordination of service of services in the area and agency's involvement in the area's continuum of care?	25	
3. The Financial Narrative form is typed and completed?	5	
4. The evaluation explains how it will be used to improve the program?	10	
Total	100	

COMMENTS: Grant Review Social Service Block Grant (SSBG)

GRANT REVIEW THREE

Complete for all agencies applying for the Domestic Violence Prevention and Treatment (PINK SECTION)

Total Points Available 100

	Max	Score
1. Proposal section does not exceed 5 pages (includes the Program and Financial Narrative and the Certification of Local Approval for Nonprofit Organizations)?	5	
2. Program Narrative has the following information:		
- "Needs" to be met & problems to be solved by the project?	15	
- Contains necessary statistics to demonstrate relevant physical, economic, social, financial, institutional or other problems?	25	
- The objective of the activities do tell who is going to do what, when, how much and how it will be measured?	15	
- The Needs Statement outlines the coordination of service of services in the area and agency's involvement in the area's continuum of care?	25	
3. The Financial Narrative form is typed and completed?	5	
4. The evaluation explains how it will be used to improve the program?	10	
Total	100	

COMMENTS: Grant Review Three - Domestic Violence Prevention and Treatment (DVPT)

GRANT REVIEW FOUR

Complete for all agencies applying for Federal Family Violence (YELLOW SECTION)

Total Points Available 100

	Max	Score
1. Proposal section does not exceed 7 pages (includes the Program and Financial Narrative and the Certification of Local Approval for Nonprofit Organizations)?	5	
2. Program Narrative has the following information:		
- "Needs" to be met & problems to be solved by the project?	15	
- Contains necessary statistics to demonstrate relevant physical, economic, social, financial, institutional or other problems?	25	
- The objective of the activities do tell who is going to do what, when, how much and how it will be measured?	15	
- The Needs Statement outlines the coordination of service of services in the area and agency's involvement in the area's continuum of care?	25	
3. The Financial Narrative form is typed and completed?	5	
4. The evaluation explains how it will be used to improve the program?	10	
Total	100	

COMMENTS: Grant Review Four - Federal Family Violence (FFV)

HOME Allocation Plan



Program Descriptions and Allocation Plan

Calendar Year 2001

Community Development Block Grant (CDBG) HOME Investment Partnerships Program (HOME)

For additional information, visit us on the Internet at www.indianahousing.org.

Methods of Distribution

The Indiana Housing Finance Authority (IHFA) allocates CDBG and HOME funds through the programs shown below. Each program area has unique criteria upon which funding decisions are based. For full program information, please refer to IHFA's full application packages and/or program guides.

PROGRAM NAME	FUNDING SOURCE	TIMING OF FUNDING
Foundations	CDBG and HOME	3 annual competitive funding cycles
CHDO Works	HOME	3 annual competitive funding cycles
Housing from Shelters to Homeownership	CDBG and HOME	CDBG - 2 annual competitive funding cycles HOME - 3 annual competitive funding cycles
Rental Housing Tax Credits (RHTC)/HOME	HOME	2 - 3 annual funding cycles
HOME Administrative Subrecipients	HOME	2 annual funding cycles
First Home/Plus	HOME	Continuous throughout the year
First Home/One Down	HOME	Continuous throughout the year
First Home 100	HOME	Continuous throughout the year
HomeChoice	HOME	Continuous throughout the year in Bartholomew, Knox, and Marion Counties

Foundations

The most successful housing programs are those that grow out of careful planning and assessment of the needs of a particular community. For this reason, IHFA provides funds to finance planning activities related to the development of affordable housing through the Foundations program.

Eligible Applicants / Eligible Activities

Housing needs assessments are used to gather data, prepare housing related community plans, and identify actions that need to be taken in order to create, develop, or preserve affordable housing. These studies are broad in nature and not specific to a particular site or activity. This activity is funded through CDBG. Only local units of government are eligible to apply for up to \$50,000 for this activity.

Feasibility studies are more specific to a particular site or housing activity and are similar to a market study. Through these studies, applicants can, among other things, identify a site for a particular project, develop a preliminary estimate of costs, or identify whether or not there is adequate demand for a particular type of affordable housing. This activity is also funded through CDBG. Only local units of government are eligible to apply for up to \$50,000 for this activity.

Predevelopment loans are similar to feasibility studies except that State-certified Community Housing Development Organizations (CHDOs) are allowed to go even further into the planning process, to the point of obtaining an option to purchase the site or developing preliminary architectural plans.

Seed money loans can be used by CHDOs to pay for such things as final architectural and engineering plans, loan reservation fees, or building permit fees. Once a project is deemed feasible and site control is obtained, a CHDO can apply for a seed money loan.

The CHDO must pay back either loan if the project goes forward. The CHDO can borrow up to \$50,000 of HOME funds for a term of 24 months at a zero percent interest rate. If the project is deemed infeasible or unable to go forward, the applicant may request that the loan be forgiven.

Scoring Criteria

IHFA has developed the following categories of criteria. If an application satisfies all applicable requirements, it will be evaluated and scored based on:

Constituency Served or Studied	36
Project Design	14
Organizational Capacity	7
Readiness to Proceed	22
Market	20
MBE/WBE Participation	<u>1</u>
Total Possible Points	100

No award shall be made to any application that scores below a total of 50 points.

Notwithstanding the point ranking system set forth above, IHFA, through its Board of Directors, reserves the right and shall have the power to allocate funds irrespective of its point ranking, if such intended allocation is: (1) in compliance with the applicable federal regulations; (2) in furtherance of the overall goals of the Authority; and (3) determined by the Board to be in the interests of the citizens of the State of Indiana.

CHDO Works

Eligible Applicants

Eligible applicants are not-for-profit organizations that have successfully obtained certification from IHFA as a Community Housing Development Organization (CHDO), are in good standing with IHFA, and serve non-participating jurisdiction areas (unless they will be developing transitional housing).^{*} Organizations that have not yet received CHDO certification (or whose certification is pending) are not eligible for operating funds.

^{*}Participating Jurisdiction areas include:

Anderson	Gary	Muncie
Bloomington	Hammond	St. Joseph County Consortium
East Chicago	Indianapolis	Terre Haute
Evansville	Lake County	Tippecanoe County Consortium
Fort Wayne		

Eligible Activities

Eligible activities are those directly related to promoting the agency's ability to develop, sponsor, and/or own HOME CHDO-eligible affordable housing, such as homebuyer, rental, lease-purchase, and transitional housing. Any applicant who successfully competes for operating funds is required to implement direct HOME CHDO-eligible housing activities within twenty-four (24) months from the date that an operating award is made.

According to 24 CFR §92.208, eligible costs include reasonable and necessary costs for the operation of the CHDO. Such costs include, but are not limited to, salaries, wages, and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment, including filing cabinets; materials; supplies; annual financial audit; and costs associated with a strategic long-range plan. Other costs may also be eligible. Applicants are encouraged to consider computer equipment needs, especially hardware and software updates.

Administrative costs associated with implementing the new lead based paint regulations are eligible for funding under CHDO Works. These expenses include training staff on the new regulations, staff certification for Lead Inspector/Risk Assessor and Lead Construction Supervisor, and special equipment purchases such as protective clothing or XRF machines.

Eligible costs do not include furniture or other office décor.

Scoring Criteria

If an application satisfies all applicable requirements, it will be evaluated and scored based on:

Organizational Capacity	20
Community Need	20
Readiness to Proceed	30
Training	20
Financial Management	<u>10</u>
Total Possible Points	100

The minimum scoring threshold for applications will vary as follows:

<u>Number of Previous “CHDO Works” Awards</u>	<u>Threshold</u>
0 awards	50 points
1 award	65 points
2 or more awards	75 points

Any application that falls below its respective threshold will not be recommended for funding.

Notwithstanding the point ranking system set forth above, IHFA, through its Board of Directors, reserves the right and shall have the power to allocate funds irrespective of its point ranking, if such intended allocation is: (1) in compliance with the applicable statutes; (2) in furtherance of promoting affordable housing; and (3) determined by IHFA’s Board of Directors to be in the interests of the citizens of the State of Indiana.

Funding Limitations

Applicants that serve non-PJ areas and have received a CHDO certification from IHFA may apply for up to \$30,000 in operating assistance. CHDOs may receive no more than one operating grant during any twelve-month period. CHDO Works funding (along with all other HOME-funded CHDO operating expenses) is limited to: (1) 50% of the CHDO’s total operating expenses in any one fiscal year, or (2) \$50,000, whichever is greater.

Housing from Shelters to Homeownership

The Housing from Shelters to Homeownership program provides grants and loans to public and private organizations for the rehabilitation or new construction of affordable housing. There are three sources of funding for this program: Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME), and the Indiana Low Income Housing Trust Fund (LIHTF). The types of housing activities that can be funded and the eligible applicants depend on the source of funding. The chart below briefly outlines what activities are eligible under each source and the type of applicant that is eligible to apply for those funds.

<u>Eligible Applicants / Eligible Activities</u>	Local Units of Government (Non-CDBG Entitlement Communities)¹	Local Units of Government & Townships (Non-HOME Participating Jurisdictions)²	Community Housing Development Organization (CHDO)²	501(c)3 Organizations, Public Housing Authorities, & Joint Ventures⁴
Emergency Shelter Rehabilitation/New Construction	CDBG			LIHTF
Youth Shelter Rehabilitation/New Construction	CDBG			LIHTF
Transitional Housing Rehabilitation ³	CDBG			
Transitional Housing Rehabilitation/New Construction ³		HOME	HOME	HOME/LIHTF
Migrant/Seasonal Farm Worker Housing Rehabilitation/New Construction	CDBG			LIHTF
Rental Rehabilitation	CDBG			
Rental Rehabilitation/New Construction		HOME	HOME	HOME/LIHTF
Lease-Purchase Rehabilitation/New Construction		HOME	HOME	HOME/LIHTF
Homebuyer Rehabilitation/New Construction		HOME	HOME	HOME/LIHTF
Owner-Occupied Rehabilitation	CDBG	HOME		HOME/LIHTF
Voluntary Acquisition/Demolition	CDBG			
Homeownership Counseling/Down Payment Assistance		HOME		HOME/LIHTF

¹ The following entitlement communities are not eligible to apply for CDBG funds unless the applicant can demonstrate that at least 51% of the beneficiaries will come from outside of the entitlement community's boundaries:

Anderson	Evansville	Goshen	Indianapolis	Mishawaka	South Bend
Bloomington	Fort Wayne	Hammond	Lafayette	Muncie	Terre Haute
East Chicago	Gary	Kokomo	Lake County	New Albany	West Lafayette
Elkhart					

² Applications from, or projects located within, the following participating jurisdictions are not eligible for HOME funds unless the request is for transitional housing:

Anderson	Gary	St. Joseph County Consortium
Bloomington	Hammond	Terre Haute
East Chicago	Indianapolis	Tippecanoe County Consortium
Evansville	Lake County	
Fort Wayne	Muncie	

³ IHFA will accept applications for HOME-funded transitional housing or LIHTF loans regardless of the project location within the state.

⁴ Joint Ventures are not eligible to apply for LIHTF loans.

Scoring Criteria

Through the scoring criteria listed below, preference is given to projects that:

- meet the needs of their specific community
- attempt to reach very low-income levels of 30% of area median income
- are ready to proceed with the project upon receipt of the award
- revitalize existing neighborhoods

If an application satisfies all applicable requirements, it will be evaluated and scored based on:

Scoring Category: Activity Type:	Constituency Served Possible Points	Development Characteristics Possible Points	Financing Possible Points	Market Possible Points	Org. Capacity Possible Points	Readiness to Proceed Possible Points	MBE/ WBE Possible Points	Total Possible Points
Emergency Shelter	20	26	12	15	10	16	1	100
Youth Shelter	20	26	12	15	10	16	1	100
Transitional Housing	20	26	12	15	10	16	1	100
Migrant/Seasonal Farm Worker	20	26	12	15	10	16	1	100
Rental	20	26	12	15	10	16	1	100
Lease-Purchase	15	34	9	15	10	16	1	100
Homebuyer	15	34	9	15	10	16	1	100
Homeownership Counseling/Down Payment Assistance	15	27	19	15	10	13	1	100
Owner Occupied Rehabilitation	20	25	9	15	10	20	1	100

No award shall be made to any development that scores below 40 points. Where applicable, the funding agreement and any restrictive covenants recorded with the property will contain restrictions applicable to the points received.

Notwithstanding the point ranking system set forth above, IHFA, through its Board of Directors, reserves the right and shall have the power to allocate funds to a development irrespective of its point ranking, if such intended allocation is: (1) in compliance with applicable statutes; (2) in furtherance of promoting affordable housing; and (3) determined by IHFA's Board of Directors to be in the interests of the citizens of the State of Indiana.

Assistance may be provided in the form of grants or loans; however, funds will be awarded only in amounts appropriate to the scope of the identified need. IHFA reserves the right to determine the exact amount and type of assistance needed for each individual project.

Funding Limitations

In general, eligible applicants can apply for up to \$750,000 in funds through the Housing from Shelters to Homeownership program. Applicants for owner-occupied rehabilitation and homeownership counseling/down payment assistance, though, are limited to a maximum of \$300,000.

The CDBG or HOME applicant's request for funding must not exceed the per unit subsidy limitations listed below:

- \$2,500 per unit in down payment assistance for beneficiaries of homeownership counseling/down payment assistance activities that are at or below 80% of the area median income for that county
- \$5,000 per unit in down payment assistance for beneficiaries of homeownership counseling/down payment assistance activities that are at or below 50% of the area median income for that county
- \$20,000 per bed for emergency shelters, youth shelters, or migrant/seasonal farm worker housing
- \$35,000 per 0 bedroom unit for transitional, rental, lease-purchase, homebuyer, or owner-occupied rehabilitation activities
- \$40,000 per 1-2 bedroom unit for transitional, rental, lease-purchase, homebuyer, or owner-occupied rehabilitation activities
- \$50,000 per 3 or more bedroom unit for transitional, rental, lease-purchase, homebuyer, or owner-occupied rehabilitation activities

Rental Housing Tax Credits (RHTC)/HOME

The Indiana Housing Finance Authority's "Multi-Family Housing Finance Application" combines requests for multiple funding sources into one application. Applications for HOME financing for a RHTC development are not accepted outside of this process.

Eligible Applicants

The HOME applicant must have an ownership interest in the development. Otherwise, any eligible applicant for RHTCs will also be considered an eligible applicant for HOME funds.

Eligible Activities

HOME funds are available statewide for the development of transitional housing. Otherwise, applications for developments located within the following participating jurisdictions are not eligible for IHFA HOME funds in conjunction with RHTCs.

Anderson	Gary	St. Joseph County Consortium
Bloomington	Hammond	Terre Haute
East Chicago	Indianapolis	Tippecanoe County Consortium
Evansville	Lake County	
Fort Wayne	Muncie	

HOME funds may be used during any portion of the development – acquisition, construction, rehabilitation, and/or permanent financing. Rental housing can be provided in the form of traditional apartments or single-room-occupancy units (SROs). SRO housing consists of single room dwelling units that are the primary residence of the occupant(s). If the development consists of conversion of non-residential space or reconstruction, SRO units must contain either kitchen or bathroom facilities (they may contain both). For developments involving acquisition or rehabilitation of an existing residential structure, neither kitchen nor bathroom facilities are required to be in the unit. However, if individual units do not contain bathroom facilities, the building must contain bathroom facilities that are shared by tenants.

IHFA awards will generally be in the form of a grant. The recipient may then invest the funds in the development in the manner that is most effective for that development (a grant, a loan, or a combination of the two).

The form and use of HOME funds will be critical in determining whether the development will receive a reduced eligible basis, a 9% credit, or a 4% credit under the RHTC program.

Scoring Criteria

There are no scoring criteria for HOME/RHTC awards. Eligibility for the HOME funds will be determined based on:

1. Whether the development demonstrates a need for HOME funds in order to make a greater number of rental units affordable to lower income households.
2. Whether the development meets State and Federal requirements of all programs for which it is applying.
3. If the development ranking is sufficient for it to be awarded RHTCs pursuant to the Tax Credit program guidelines.
4. The availability of HOME funds.

Funding Limitations

The maximum HOME request is \$300,000. IHFA has established a per unit subsidy limitation for HOME-assisted units of \$35,000 for 0-bedroom units, \$40,000 for 1- and 2-bedroom units, and \$50,000 for units with 3 or more bedrooms.

HOME Administrative Subrecipients

IHFA staff generally oversees the implementation of the HOME program; however, IHFA accepts proposals from organizations interested in participating in specific areas of administration that compliment and/or expand IHFA's efforts.

IHFA will accept administrative proposals twice during 2001. The published deadlines are March 1st and November 1st. Beyond these deadlines, IHFA reserves the right to initiate subrecipient agreements with not-for-profit organizations or public agencies for specific HOME administrative activities. These subrecipient agreements will be made available throughout the year upon approval of the activity by the IHFA Board of Directors.

Eligible Applicants

- Not-for-profit corporations, as designated under section 501(c)(3) of the Internal Revenue Code
- Public agencies

Eligible Activities

- Only those activities allowed under the HOME regulations (24 CFR 92.207) are eligible for funding with IHFA's HOME administration funds.
- HOME subrecipient activities must comply with the requirements of 24 CFR 84 (a.k.a. OMB Circular A-110) "Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Not-for-profit Organizations."
- In general, IHFA looks for proposals that have a statewide impact and serve to further the Authority's efforts in one or more of the following areas:
 - General management, oversight, and coordination of the HOME program
 - Providing public information to residents and citizen organizations participating in the planning, implementation, or assessment of projects being assisted with HOME funds
 - Affirmatively furthering fair housing
 - Compiling data in preparation for the state Consolidated Plan
 - Complying with other federal requirements such as affirmative marketing; minority outreach; environmental review; displacement, relocation, and acquisition; labor standards; lead-based paint; and conflicts of interest.

Scoring Criteria

There are no scoring criteria for HOME Administrative Subrecipient awards. Eligibility for these funds will be determined based on:

1. Whether proposed activities have a statewide impact.
2. Whether the proposal demonstrates a need for HOME funds.
3. Whether proposed activities meet the HOME regulatory requirements of an administrative subrecipient.
4. Whether proposed activities serve to further IHFA staff efforts.
5. The availability of HOME administrative funds.

Funding Limitations

As allowed by HOME regulations (24 CFR 92.207), IHFA may expend up to 10% of the annual allocation for payment of reasonable administrative and planning costs of the HOME program.

First Home/Plus

Difficulty in coming up with cash for a down payment is often the biggest obstacle for first-time homebuyers. Subsequently, IHFA has developed the First Home/Plus program, through which IHFA links HOME funds in the form of down payment assistance with its Mortgage Revenue Bond (MRB) program.

Eligible Applicants

The borrower must meet the following eligibility requirements:

1. Must be a first-time homebuyer (i.e. has not, at any time during the three years preceding the date of loan closing had an ownership interest in his/her principal residence), unless the buyer is purchasing a home located in a targeted area as published in IHFA's First Home/Plus Program Guide.
2. Must be income-eligible as published in IHFA's First Home/Plus Program Guide.
3. If a borrower is separated from their spouse, a legal separation agreement or a petition for the dissolution is required prior to preliminary approval.
4. Must reasonably expect to reside in the property as his/her principal residence within 60 days after the loan closing date on existing homes and within 60 days of completion for a newly constructed home.
5. Must currently be or intend to become a resident of the State of Indiana.
6. Must successfully complete a homeownership training program.

Eligible Activities

Income-eligible homebuyers can receive up to 10% of the home purchase price in down payment assistance in conjunction with a below-market interest rate mortgage through IHFA. The First Home/Plus program is operated through a partnership between IHFA and participating local lending institutions throughout Indiana. HOME down payment assistance is provided as a 0%, forgivable second mortgage. If the buyer resides in the property for five years, the second mortgage is forgiven. For the purchase of an existing home, for three months prior to the sale, the home must have been vacant, occupied by the seller, or rented to the household that is buying the home.

Funds are allocated on a first-come, first-served basis. Interested borrowers must contact a participating lender to apply for the program. Borrowers are encouraged to contact a participating lender for loan "pre-approval" before they begin looking for a house.

Borrowers must successfully complete a homeownership training program. The participating lender may choose the type of training the borrower receives; however, IHFA strongly recommends a face to face or classroom course given by a HUD approved counselor. A certificate of completion or achievement is required in the loan application package.

Funding Limitations

Depending upon their income, borrowers receive HOME funded down payment assistance of 5% or 10% (capped at \$2,500 and \$5,000, respectively) of the sales price or the appraised value of the property, whichever is less. Acquisition cost of the home may not exceed the lesser of the maximum as set forth in IHFA's First Home/Plus Program Guide or FHA 203(b) Mortgage Limits as published periodically by HUD.

First Home/One Down

IHFA and Fannie Mae jointly offers the First Home/One Down program, which allows qualified first-time home buyers to obtain mortgages with an investment as little as 1%. The loans are offered through IHFA and its statewide network of participating mortgage lenders. In many ways, the First Home/One Down program is operated in the same manner as IHFA's First Home/Plus program, as described in the previous section. Differences between the two programs are highlighted below.

IHFA/Fannie Mae's First Home/One Down program offers homebuyers affordable conventional financing. The qualified homebuyer obtains a first mortgage at a below market interest rate. HOME down payment assistance of 5% or 10% (capped at \$2,500 and \$5,000, respectively), depending upon the buyer's income, is provided in the form of a 0% forgivable second mortgage.

Borrowers must have at least 1% of their own funds invested in the transaction. Sellers may pay up to 3% of the sales price in closing cost. The normal Fannie Mae requirement of having cash reserves left in the bank after closing equal to two months mortgage payments is waived. Pre- and post-purchasing counseling, as well as a whole-house inspection, are requirements of the program.

First Home 100

The First Home 100 program combines IHFA's First Home program and Rural Development's Direct Loans to stretch resources and reach a broader number of eligible borrowers. It is available in areas that are served by Rural Development. Hoosiers can apply for the program through Rural Development offices.

IHFA and Rural Development have combined their income and purchase price limits to make it simpler to determine eligibility for the program. Under First Home 100, an eligible borrower would receive two mortgages, one from IHFA's First Home program, with a below market interest rate, and one from Rural Development, with an interest rate based on the applicant's ability to pay. In some cases, a borrower may also qualify for IHFA's HOME funded down payment assistance, which would result in a forgivable third mortgage to further reduce the borrower's monthly payments.

While IHFA's First Home programs are primarily restricted to first-time homebuyers, this requirement is waived in 30 rural Indiana counties that are designated as targeted areas by the U.S. Department of Housing and Urban Development. These areas largely coincide with the areas served by Rural Development.

HomeChoice

The HomeChoice program was created by Fannie Mae to provide affordable housing for low- to moderate-income individuals who are disabled or who have disabled dependents living with them. Fannie Mae has approved Indiana's HomeChoice Program, and a public announcement was made on January 24, 2001. The availability of this program in Indiana is the result of a team effort among IHFA, Fannie Mae, the Back Home in Indiana Alliance, and Irwin Mortgage. The program is tailored to meet the unique needs of people with disabilities by offering lower down payment requirements; flexible qualifying and underwriting standards; and use of non-traditional credit histories.

To be eligible for the HomeChoice, program applicants must meet certain requirements. Borrowers must be classified as disabled as established in the Americans with Disabilities Act of 1990 or be defined as handicapped by the Fair Housing Amendments of Act of 1988. Also, borrowers must be low- or moderate-income as defined by the U.S. Department of Housing and Urban Development (HUD), which varies by county. In addition, the borrower must occupy the home within 60 days of the loan's closing or completion.

During the pilot phase, HomeChoice will be offered in three counties: Bartholomew, Knox, and Marion, with hopes of going statewide in the future. IHFA has earmarked \$1 million in revenues from its non-taxable mortgage revenue bonds (MRBs) to finance the first mortgages. Additionally, borrowers receive HOME funded down payment assistance of 10% of the sales price or the appraised value of the property, whichever is less. Irwin Mortgage will originate the mortgages, and the Back Home in Indiana Alliance will market, screen applicants, and coordinate counseling for the program. If the program is deemed successful, the HomeChoice partners will assist IHFA in broadening the program throughout the state, and additional sources of funds will be identified.

HOME Investment Partnerships Program – Funds Transfer

IHFA, at its discretion, may authorize HUD to transfer a portion of the State's allocation of HOME Investment Partnerships Program funds to qualifying communities to meet a \$500,000 threshold funding level.

HOME Investment Partnerships Program - Resale/Recapture Guidelines

In accordance with the HOME Investment Partnerships Program, 24 CFR Part 92.254(a)(4), the State of Indiana is establishing policy guidelines to ensure affordability for low-income homebuyers. Because of the diversity of program designs throughout the State, recapture provisions will be appropriate for some project designs and resale provisions will be appropriate for others.

Affordability Periods

HOME-assisted housing must meet the affordability requirements listed below, beginning after project completion. Project completion, as defined by HUD, means that:

- all necessary title transfer requirements and construction work have been performed;
- the project complies with the HOME requirements, including the property standards requirement under 24 CFR 92.251;
- the final drawdown has been disbursed for the project; and
- the project completion information has been entered into HUD's IDIS system.

Homeownership Assistance HOME amount per unit	Minimum period of affordability
under \$15,000	5 years
\$15,000 - \$40,000	10 years
over \$40,000	15 years

Termination of Affordability Period

The affordability restrictions must terminate upon occurrence of any of the following termination events: foreclosure, transfer in lieu of foreclosure, or assignment of an FHA insured mortgage to HUD. The housing provider of HOME funds may use purchase options, rights of first refusal, or other preemptive rights to purchase the housing before foreclosure to preserve affordability. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the termination event, or any entity that includes the former owner or those with whom the former owner has or had family or business ties, obtains an ownership interest in the project or property.

Resale Guidelines

Where the program design calls for no recapture or where a program sponsor so chooses, the guidelines for resale may be adopted in lieu of recapture guidelines. Resale restrictions will require the seller to sell the property only to a low-income family that will use the property as their principal residence. The term "low-income family" shall mean a family whose gross annual income does not exceed 80% of the median family income for the geographic area as published annually by HUD.

The purchasing family should pay no more than 30% of its gross family income towards the principal, interest, taxes, and insurance for the property on a monthly basis. Individual grantees may, however, establish guidelines that better reflect their mission and clientele. Such guidelines should be described in the application, program guidelines, or award agreement. The housing shall remain affordable to a reasonable range of low-income buyers for the period described in the HOME regulations, as from time to time may be amended.

The homeowner selling the property will be allowed to receive a fair return on investment, which will include the homeowner's investment and any capital improvements made to the property.

Recapture Guidelines

The amount of HOME funds subject to recapture is based on the amount of HOME assistance that enabled the homebuyer to buy or lease the dwelling unit. This includes any HOME assistance that reduced the purchase price from the fair market value to an affordable price, but excludes the amount between the cost of producing the unit and the market value (i.e., development subsidy). IHFA will calculate the amount of HOME recapture based on the lesser of (1) the prorated amount remaining to be forgiven each year for the term of the affordability period; or (2) the net proceeds of from the sale of the house shared between IHFA and the homeowner.

Proration

The affordability period is determined by the amount of HOME funds that went into the unit. In the examples below, the affordability period is for ten years. The grantee must determine in its program guidelines the amount of prorata share that will be forgiven each year over the affordability period.

Net Sale Proceeds

The net proceeds are the sales price minus loan repayment (other than HOME funds) and closing costs. If the net proceeds are not sufficient to recapture the full amount of the HOME investment plus recover the amount of the homeowner's down payment and any capital improvement made by the owner since purchase, IHFA will share the net proceeds with the homeowner.

The net proceeds may be divided proportionally as set forth in the following mathematical formula:

$$\text{HOME Recapture Amount} = (HI / (HI + HOI)) \times \text{Net Proceeds}$$

$$\text{Homeowner Amount} = (HOI / (HI + HOI)) \times \text{Net Proceeds}$$

HI = HOME Investment

HOI = Homeowner Investment

Capital Improvements

Capital improvements are defined as the cost of improvements that increase the value of property or lengthen its life. Examples include, but are not limited to, putting a recreation room in an unfinished basement, adding another bathroom or bedroom, putting up a fence, putting in new plumbing or wiring, installing a new roof, or paving the driveway.

Indiana Housing Finance Authority
2001 Proposed CDBG and HOME Allocations

Community Development Block Grant (CDBG)

Foundations

- Housing Needs Assessments
- Site-Specific Feasibility Studies

Housing from Shelters to Homeownership

- Emergency Shelters Rehabilitation/New Construction ¹
- Youth Shelters Rehabilitation/New Construction ¹
- Transitional Housing Rehabilitation ¹
- Migrant/Seasonal Farmworker Housing Rehabilitation/New Construction
- Rental Rehabilitation
- Owner-Occupied Rehabilitation

Total

Proposed FY99		Awards During PY 99 7/1/99 - 6/30/00	
\$200,000	4%	\$175,000	4%
		\$80,000	2%
		\$95,000	2%
\$4,800,000	96%	\$4,424,500	96%
		\$0	0%
		\$480,000	10%
		\$0	0%
		\$444,500	10%
		\$0	0%
		\$3,500,000	76%
\$5,000,000	100%	\$4,599,500	100%

Proposed FY 00		Awards to Date During PY 00 7/1/00 - 2/28/01	
\$200,000	4%	\$155,000	3%
\$100,000	2%	\$155,000	3%
\$100,000	2%	\$0	0%
\$4,800,000	96%	\$4,954,259	97%
\$500,000	10%	\$1,296,759	25%
\$500,000	10%	\$0	0%
\$500,000	10%	\$0	0%
\$500,000	10%	\$0	0%
\$750,000	15%	\$500,000	10%
\$2,050,000	41%	\$3,157,500	62%
\$5,000,000	100%	\$5,109,259	100%

Proposed FY 01	
\$300,000	6%
\$200,000	4%
\$100,000	2%
\$4,700,000	94%
\$500,000	10%
\$500,000	10%
\$500,000	10%
\$500,000	10%
\$750,000	15%
\$1,950,000	39%
\$5,000,000	100%

HOME Investment Partnerships Program (HOME)

Foundations

- CHDO Predevelopment Loans
- CHDO Seed Money Loans

Housing from Shelters to Homeownership

- Transitional Housing Rehabilitation/New Construction ¹
- Rental Rehabilitation/New Construction
- Lease-Purchase Rehabilitation/New Construction
- Homebuyer Rehabilitation/New Construction
- Owner-Occupied Rehabilitation
- Homeownership Counseling/Downpayment Assistance

CHDO Works

HOME/RHTC

First Home ²

HOME/501c3 Bonds

Administration ³

Administrative Subrecipient Agreements

Total

\$200,000	1%	\$206,100	1%
		\$206,100	1%
		\$0	0%
\$7,052,500	51%	\$7,012,757	50%
		\$2,247,500	16%
		\$1,553,000	11%
		\$0	0%
		\$1,735,634	12%
		\$533,873	4%
		\$942,750	7%
\$500,000	4%	\$535,350	4%
\$1,150,000	8%	\$1,144,000	8%
\$3,200,000	23%	\$3,647,010	26%
\$250,000	2%	\$0	0%
\$1,372,500	10%	\$856,836	6%
		\$604,000	4%
\$13,725,000	100%	\$14,006,053	100%

\$200,000	1%	\$151,000	1%
\$200,000		\$151,000	1%
\$0		\$0	0%
\$7,218,800	51%	\$6,908,152	68%
\$1,500,000	11%	\$1,568,797	16%
\$2,000,000	14%	\$2,036,535	20%
\$1,000,000	7%	\$300,000	3%
\$1,000,000	7%	\$897,700	9%
\$1,000,000	7%	\$345,620	3%
\$718,800	5%	\$1,759,500	17%
\$500,000	4%	\$240,000	2%
\$1,250,000	9%	\$462,700	5%
\$3,300,000	23%	\$1,555,436	15%
\$250,000	2%	\$0	0%
\$1,413,200	10%	\$600,429	6%
		\$189,694	2%
\$14,132,000	100%	\$10,107,411	100%

\$450,000	3%
\$250,000	2%
\$200,000	1%
\$7,009,900	43%
\$1,500,000	9%
\$1,500,000	9%
\$1,000,000	6%
\$1,000,000	6%
\$1,000,000	6%
\$1,009,900	6%
\$600,000	4%
\$3,000,000	19%
\$3,300,000	20%
\$150,000	1%
\$1,612,100	10%
\$16,122,000	100%

-CHDO Project Awards Included in Above Activity Totals
(minimum 15%)

\$2,750,000 20% \$4,762,634 34%

\$4,500,000 32% \$3,540,415 35%

\$5,200,000 32%

-Amount Transferred to Participating Jurisdictions ⁴
Total

\$127,000
\$13,852,000

\$88,000
\$14,220,000

\$0
\$16,122,000

Notes:

¹ Emergency shelters, youth shelters, and transitional housing - \$2.5 million funding goal for calendar years 1994-1999, \$3 million funding goal beginning in calendar year 2000.

² Award column includes houses funded with HOME Program Income. Data reflects closing date.

³ Proposed amount includes total admin for IHFA, grantees, subrecipients, & other professional administrative contracts. Award column indicates IHFA admin and professional contract expenditures only.

⁴ Transfer of HOME funds from IHFA to various state Participating Jurisdictions to bring each area's allocation up to a level of \$500,000.

HOPWA Allocation Plan

2001 HOPWA Formula Allocation

Project Sponsor	Region Number	Counties Served	HOPWA Allocation
Greater Hammond Community Services (Hammond)	1	Lake, LaPorte, Porter	\$190,593
AIDS Ministries/AIDS Assist (South Bend)	2	Elkhart, Fulton, Marshall, Pulaski, St. Joseph, Starke	\$ 88,400
AIDS Taskforce NE Indiana (Fort Wayne)	3	Adams, Allen, DeKalb, Huntington, Kosciusko, LaGrange, Noble, Steuben, Wabash, Wells, Whitley	\$ 85,091
Area IV Agency on Aging (Lafayette)	4	Benton, Carroll, Clinton, Fountain, Jasper, Montgomery, Newton, Tippecanoe, Warren, White	\$ 33,374
Open Door Community Services (Muncie)	5	Cass, Howard, Miami, Tipton	\$ 23,583
Open Door Community Services (Muncie)	6	Blackford, Delaware, Grant, Jay, Randolph	\$ 38,615
Damien Center (Indianapolis)	7	Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby	
Area 7 Agency on Aging (Terre Haute)	8	Clay, Parke, Putnam, Sullivan, Vermillion, Vigo	\$ 52,682
AIDS Task Force SE Central Indiana (Richmond)	9	Decatur, Fayette, Franklin, Henry, Ripley, Rush, Union, Wayne	\$ 25,927
Public Health Nursing, Positive Link (Bloomington)	10	Bartholomew, Brown, Greene, Lawrence, Monroe, Owen	\$ 48,544
Clark County Health Department (Jeffersonville)	11	Crawford, Jackson, Jefferson, Jennings, Orange, Switzerland, Washington	\$ 10,896
AIDS Resource Group (Evansville)	12	Daviess, Dubois, Gibson, Knox, Martin, Perry, Pike, Posey, Spencer, Vanderburgh, Warrick	\$ 67,715

Note: Clark, Floyd, Harrison and Scott Counties are served by the Louisville, KY Metropolitan area and Dearborn and Ohio Counties are served by the Cincinnati, OH Metropolitan area.



Housing Opportunities for People with AIDS (HOPWA)

Program Description and Allocation Plan
Calendar Year 2001

For additional information, visit us on the Internet at www.indianahousing.org or contact the following:

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The HOPWA program is a federal funded program administered through the United States Department of Housing and Urban Development (HUD) and is mandated by 24 CFR Part 574. The HOPWA program provides housing assistance and related supportive services for low-income persons with HIV/AIDS and their families. Prior to program year 2001, HUD allocated the HOPWA funding to the state of Indiana through the Indiana Department of Health; however, beginning with the program year 2001 allocation, the HOPWA funds will be allocated to the Indiana Housing Finance Authority for distribution throughout the state of Indiana.

Methods of Distribution

The Indiana Housing Finance Authority is allocating the HOPWA funds through an application process to eleven HIV/AIDS Care Coordination sites covering the 77 counties. (The other fifteen counties either receive their own allocation or are served by the Louisville or Cincinnati metropolitan area). The eleven Care Coordination sites have an established relationship with the Indiana Department of Health in conducting HIV/AIDS related services.

In order to determine the formula allocation to the eleven Care Coordination sites, the Indiana Housing Finance Authority invited the eleven Care Coordination sites, the Damien Center, the Indiana Department of Health, and consumers to participate in a technical assistance meeting regarding the administration of the HOPWA program. The group came to the consensus that the Indiana Housing Finance Authority should distribute the money to the eleven Care Coordination sites based on epidemiological data which is the number of HIV/AIDS cases per county as of December 31, 2000.

The allocation is as follows:

Eleven Care Coordination Sites	\$617,400.00
Care Coordination Sites Administration	\$ 48,020.00
Indiana Housing Finance Authority Administration	<u>\$ 20,580.00</u>
Total	\$686,000.00

If additional funding becomes available during the program year, IHFA will evaluate the best alternatives in allocating these funds to the state of Indiana.

Eligible Applicants

Eligible applicants are only the eleven Care Coordination sites covering the 77 Indiana counties that have an established relationship with the Indiana State Department of Health to conduct HIV/AIDS related services. Care Coordination sites are based in one county; however, the Care Coordination sites have a multi county service area for HIV/AIDS related services.

IHFA has given each of the eleven Care Coordination Sites their regional allocation of HOPWA funds including their portion of the administrative dollars. IHFA is in the process of developing an application that will be submitted by the Care Coordination sites explaining how the Care Coordination sites would like to expend their HOPWA allocation. The HOPWA funds can only be expended on those eligible costs listed under the eligible activities HOPWA section. IHFA will allow the Care Coordination sites to determine what eligible line items that the HOPWA funds should be spent since the Care Coordination sites know the needs in their respective regions. IHFA will evaluate each application submitted in order to determine if the Care Coordination site can carry out the proposed activities. IHFA will offer technical assistance to ensure that the needs to each region are met through the Care Coordination sites.

During the next program year, IHFA will be determining whether there are other organizations in the state that have experience in administering HIV/AIDS related services and inviting them into the allocation process.

Eligible Activities

Housing Information

Description:	Housing information services including, but not limited to, counseling, information and referral services to assist an eligible person to locate, acquire, finance and maintain housing. This may also include fair housing counseling for eligible persons who may encounter discrimination on the basis of race, color, religion, sex, age, national origin, familial status, or handicap.
Examples:	Salary for community outreach worker, housing counselor, posters, brochures outlining services offered, seminars for other providers about HIV and potential referral sources.

Resource Identification

Description: Resource identification to establish, coordinate and develop housing assistance resources for eligible persons (including conducting preliminary research and making expenditures necessary to determine the feasibility of specific housing-related initiatives).

Examples: Needs assessments, architect fees, site identification, salaries of housing planners, affordable housing conferences and trainings fees.

Acquisition, Rehab, Repair

Description: Acquisition, rehabilitation, conversion, lease, and repair of facilities to provide housing and services.

Examples: Buy a house and rehabilitate it; repair existing housing owned or leased by people living with HIV/AIDS, or buy land to build a housing project.

New Construction

Description: New construction (for single room occupancy (SRO) dwellings and community residences only).

Examples: Build a group home or multi-family type structure.

Rental Assistance

Description: Project- or tenant-based rental assistance, including assistance for shared housing arrangements.

Examples: Paying for Section 8 type assistance, long term tenant must pay 30% of income towards housing, waivers have been granted. Project based rental assistance is setting aside dedicated units in a housing development and paying rents with HOPWA funds. Residency is limited to people living with HIV/AIDS.

Short-term rent

Description: Short-term rent, mortgage, and utility payments to prevent the homelessness of the tenant or mortgagor of a dwelling.

Examples: Project sponsors can provide as needed rent, mortgage and/or utility assistance for clients as homeless prevention. The cap for assistance is 21 weeks out of any 52; the tenant cannot pay rent that exceeds the Fair Market Rent as published by bedroom size and county. The utility assistance is based on the utility allowance schedule.

Supportive Services

Description: Supportive services including, but not limited to, health, mental health, assessment, permanent housing placement, drug and alcohol abuse treatment and counseling, day care, personal assistance, nutritional services, intensive care when required, and assistance in gaining access to local, State, and Federal government benefits and services, except that health services may only be provided to individuals with acquired immunodeficiency syndrome or related diseases and not to family members of these individuals.

Examples: Salaries, treatment program fees, **not** for medical fees or hospital services or for HIV medications. The supportive services must be linked to keeping the clients successfully housed.

Operating Costs

Description: Operating costs for housing including maintenance, security, operation, insurance, utilities, furnishings, equipment, supplies, and other incidental costs.

Examples: Costs must be specific to HIV/AIDS specific housing, furniture for the group home, utilities, – can include salaries of security, maintenance crews.

Technical Assistance

Description: Technical assistance in establishing and operating a community residence, including planning and other pre-development or pre-construction expenses and including, but not limited to, costs relating to community outreach and educational activities regarding AIDS or related diseases for persons residing in proximity to the community residence.

Examples: Staff time related to technical assistance, costs of meetings, seminars, planning related expenses. Technical assistance must be specific to community residences.

Administrative Fee

Description: Administrative expenses: (i) Each grantee may use not more than 3 percent of the grant amount for its own administrative costs relating to administering grant amounts and allocating such amounts to project sponsors; and (ii) Each project sponsor receiving amounts from grants made under this program may use not more than 7 percent of the amounts received for administrative costs.

Examples: IHFA is the grantee and will use 3% of the Program Year 2001 allocation for our administrative costs. The lead agencies are the project sponsors and can take up to 7% for administrative costs. Eligible costs include: staff time related to project, filing reports, tracking data, etc.

Appendix H.

HUD Regulations Cross-Walk

This appendix refers the reader to those sections in the 1999 Consolidated Plan Update that are intended to fulfill Sections 91.300 through 91.330 of HUD's regulations governing the contents of the state-level consolidated submission for community planning and development programs. Specifically, the bold and italicized text following each subsection refers to a textual location in the Consolidated Plan Update.

Subpart D – State Governments; Contents of Consolidated Plan

Sec. 91.300 General

(a) A complete consolidated plan consists of the information required in Secs. 91.305 through 91.330, submitted in accordance with instructions prescribed by HUD (including tables and narratives), or in such other format as jointly agreed upon by HUD and the State.

See Appendix H, all.

(b) The State shall describe the lead agency or entity responsible for overseeing the development of the plan and the significant aspects of the process by which the consolidated plan was developed, the identity of the agencies, groups, organizations and others who participated in the process, and a description of the State's consultations with social service agencies and other entities. It also shall include a summary of the citizen participation process, public comments, and efforts made to broaden public participation in the development of the consolidated plan. *See Section I and Appendix A, D and E, all.*

Sec. 91.305 Housing and homeless needs assessment

(a) General. The consolidated plan must describe the State's estimated housing needs projected for the ensuing five-year period. Housing data included in this portion of the plan shall be based on U.S. Census data, as provided by HUD, as updated by any properly conducted local study, or any other reliable source that the State clearly identifies and should reflect the consultation with social service agencies and other entities conducted in accordance with Sec. 91.110 and the citizen participation process conducted in accordance with Sec. 91.115. For a State seeking funding under the HOPWA program, the needs described for housing and supportive services must address the needs of persons with HIV/AIDS and their families in areas outside of eligible metropolitan statistical areas. *See Sections II III, IV, and V, all.*

(b) Categories of persons affected. The consolidated plan shall estimate the number and type of families in need of housing assistance for extremely low-income, low-income, moderate-income, and middle-income families, for renters and owners, for elderly persons, for single persons, for large families, for persons with HIV/AIDS and their families, and for persons with disabilities. The description of housing needs shall include a discussion of the cost burden and severe cost burden,

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overcrowding (especially for large families), and substandard housing conditions being experienced by extremely low-income, low-income, moderate-income and middle-income renters and owners compared to the State as a whole. *See Section III, IV and V, all.*

For any of the income categories enumerated in paragraph (b)(1) of this section, to the extent that any racial or ethnic group has disproportionately greater need in comparison to the needs of that category as a whole, assessment of that specific need shall be included. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in the category as a whole. *See Section III, IV and V, all.*

(c) Homeless needs. The plan must describe the nature and extent of homelessness (including rural homelessness) within the State, addressing separately the need for facilities and services for homeless individuals and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with a table prescribed by HUD. This description must include the characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but threatened with homelessness. The plan also must contain a narrative description of the nature and extent of homelessness by racial and ethnic group, to the extent information is available. *See Section V, especially “Persons who are Homeless.”*

(d) Other special needs. The State shall estimate, to the extent practicable, the number of persons who are not homeless but require supportive housing, including the elderly, frail elderly, person with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and any other categories the State may specify, and describe their supportive housing needs. *See Section V, all.*

With respect to a State seeking assistance under the HOPWA program, the plan must identify the size and characteristics of the population with HIV/AIDS and their families within the area it will serve. *See Section V, especially “Persons with HIV/AIDS.”*

Lead-based paint hazards. The plan must estimate the number of housing units within the State that are occupied by low-income families or moderate-income families that contain lead-based paint hazards, as defined in this part. *See Section IV, especially “Lead Safe Housing.”*

Sec. 91.310 Housing market analysis

(a) General characteristics. Based on data available to the State, the plan must describe the significant characteristics of the State’s housing markets (including such aspects as the supply, demand and condition and cost of housing). *See Sections III and IV, all.*

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(b) Homeless facilities. The plan must include a brief inventory of facilities and services that meet the needs for emergency shelter and transitional housing needs of homeless persons within the State. *See Section V, especially “Persons who are Homeless.”*

(c) Special needs facilities and services. The plan must describe, to the extent information is available, the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing. *See Section V, all.*

(d) Barriers to affordable housing. The plan must explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing in the State are affected by its policies, including tax policies affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment. *See Section IV, especially “Barriers to Housing Affordability.”*

Sec. 91.315 Strategic plan

(a) General. For the categories described in paragraphs (b), (c), (d), and (e) of this section, the consolidated plan must do the following:

Indicate the general priorities for allocating investment geographically within the State and among priority needs.

Describe the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs. *See Section VI.*

Summarize the priorities and specific objectives, describing how the proposed distribution of funds will address identified needs.

For each specific objective, identify the proposed accomplishments the State hopes to achieve in quantitative terms over a specific time period (i.e., one, two, three or more years), or in other measurable terms as identified and defined by the State. *See Section VI and Appendix G, all.*

(b) Affordable housing. With respect to affordable housing, the consolidated plan must do the following:

The description of the basis for assigning relative priority to each category of priority need shall state how the analysis of the housing market and the severity of housing problems and needs of extremely low-income, low-income, and moderate-income renters and owners identified in accordance with Sec. 91.305 provided the basis for assigning the relative priority given to each priority need category

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in the priority housing needs table prescribed by HUD. Family and income types may be grouped together for discussion where the analysis would apply to more than one of them; *See Section VI.*

The statement of specific objectives must indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. *See Section VI, and Sections III and IV for supporting market analysis and needs.*

The description of proposed accomplishments shall specify the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined in Sec. 92.252 of this subtitle for rental housing and Sec. 92.254 of this subtitle for homeownership over a specific time period. *See Section VI.*

(c) Homelessness. With respect to homelessness, the consolidated plan must include the priority homeless needs table prescribed by HUD and must describe the State's strategy for the following:

Helping low-income families avoid becoming homeless;

Reaching out to homeless persons and assessing their individual needs;

Addressing the emergency shelter and transitional housing needs of homeless persons; and,

Helping homeless persons make the transition to permanent housing and independent living.

For all of the above, see Section V, "Persons who are Homeless," Section VI for related strategies, and Appendix G for allocated funds.

(d) Other special needs. With respect to supportive needs of the non-homeless, the Consolidated Plan must describe the priority housing and supportive service needs of persons who are not homeless but require supportive housing (i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents). *See Section V, all, Section VI for related strategies, and Appendix G for allocated funds.*

(e) Non-housing community development plan. If the State seeks assistance under the Community Development Block Grant program, the consolidated plan must describe the State's priority non-housing community development needs that affect more than one unit of general local government and involve activities typically funded by the State under the CDBG program. These priority needs must be described by CDBG eligibility category, reflecting the needs of persons of families for each type of activity. This community development component of the plan must state the State's specific long-term and short-term community development objectives (including

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economic development activities that create jobs), which must be developed in accordance with the statutory goals described in Sec. 91.1 and the primary objective of the CDBG program to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for low-income and moderate-income persons. *See Section III, especially “Community Development Needs,” Section VI for related strategies, and actions, and Appendix G for allocated funds.*

(f) Barriers to affordable housing. The consolidated plan must describe the State’s strategy to remove or ameliorate negative effects of its policies that serve as barriers to affordable housing, as identified in accordance with Sec. 91.310. *See Section IV, especially “Barriers to Housing Affordability.”*

(g) Lead-based paint hazards. The consolidated plan must outline the actions proposed or being taken to evaluate and reduce lead-based paint hazards, and describe how the lead-based paint hazard reduction will be integrated into housing policies and programs. *See Section IV, “Lead Safe Housing.”*

(h) Anti-poverty strategy. The consolidated plan must describe the State’s goals, programs, and policies for reducing the number of poverty level families and how the State’s goals, programs, and policies for producing and preserving affordable housing, set forth in the housing component of the consolidated plan, will be coordinated with other programs and services for which the State is responsible and the extent to which they will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the State has control. *See Section VI, “Anti-Poverty Strategy.”*

(i) Institutional structure. The consolidated plan must explain the institutional structure, including private industry, nonprofit organizations, and public institutions, through which the State will carry out its housing and community development plan, assessing the strengths and gaps in that delivery system. The plan must describe what the State will do to overcome gaps in the institutional structure for carrying out its strategy for addressing its priority needs. *See Section VI, especially goals for enhancing the capacity of nonprofits in the state.*

(j) Coordination. The consolidated plan must describe the State’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies. With respect to the public entities involved, the plan must describe the means of cooperation and coordination among the State and any units of general local government in the implementation of its consolidated plan. *See Section VI, especially goals for enhancing the capacity of nonprofits in the state.*

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(k) Low-income housing tax credit use. The consolidated plan must describe the strategy to coordinate the Low-income Housing Tax Credit with the development of housing that is affordable to low-income and moderate-income families. *See Section VI, especially text related to Rental Housing Tax Credits.*

(l) Public housing resident initiatives. For a State that has a State housing agency administering public housing funds, the consolidated plan must describe the State's activities to encourage public housing residents to become more involved in management and participate in homeownership. *See Section VI for strategies for increasing homeownership and Appendix G for other related strategies.*

Sec. 91.320 Action plan

The action plan must include the following:

(a) Form application. Standard Form 424.

(b) Resources

Federal resources. The consolidated plan must describe the Federal resources expected to be available to address the priority needs and specific objectives identified in the strategic plan, in accordance with Sec. 91.315. These resources include grant funds and program income. *See Section VI and Appendix G, all.*

Other resources. The consolidated plan must indicate resources from private and non-Federal public sources that are reasonably expected to be made available to address the needs identified in the plan. The plan must explain how Federal funds will leverage those additional resources, including a description of how matching requirements of the HUD programs will be satisfied. Where the State deems it appropriate, it may indicate publicly owned land or property located within the State that may be used to carry out the purposes stated in Sec. 91.1.

(c) Activities. A description of the State's method for distributing funds to local governments and nonprofit organizations to carry out activities, or the activities to be undertaken by the State, using funds that are expected to be received under formula allocations (and related program income) and other HUD assistance during the program year and how the proposed distribution of funds will address the priority needs and specific objectives described in the consolidated plan. *See Appendix G.*

(d) Geographic distribution. A description of the geographic areas of the State (including areas of minority concentration) in which it will direct assistance during the ensuing program year, giving the rationale for the priorities for allocating investment geographically. *See Section VI for the State's overall distribution plan and Appendix G for program distribution plans.*

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(e) Homeless and other special needs activities. Activities it plans to undertake during the next year to address emergency shelter and transitional housing needs of homeless individuals and families (including subpopulations), to prevent low-income individuals and families with children (especially those with incomes below 30 percent of median) from becoming homeless, to help homeless persons make the transition to permanent housing and independent living, and to address the special needs of persons who are not homeless identified in accordance with Sec. 91.315(d).

See Section VI for related strategies.

(f) Other actions. Actions it plans to take during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing (including the coordination of Low-Income Housing Tax Credits with the development of affordable housing), remove barriers to affordable housing, evaluate and reduce lead-based paint hazards, reduce the number of poverty level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies and foster public housing resident initiatives. (See Sec. 91.315 (a), (b), (f), (g), (h), (i), (j), (k) and (l).) *See Section VI for related strategies.*

(g) Program-specific requirements. In addition, the plan must include the following specific information:

CDBG. *See Appendix G, CDBG documentation.*

HOME. *See Appendix G, HOME documentation.*

ESG. The State shall state the process for awarding grants to State recipients and a description of how the State intends to make its allocation available to units of local government and nonprofit organizations. *See Appendix G, ESG documentation.*

HOPWA. The State shall state the method of selecting project sponsors. *See Appendix G, HOPWA documentation.*

Sec. 91.325 Certifications

See Appendix B for all Certifications.

(a) General. *For all items in 91.325 (a)-(d), see Appendix B.*

Affirmatively further fair housing. Each State is required to submit a certification that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the State, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.

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Anti-displacement and relocation plan. The State is required to submit a certification that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug-free workplace. The State must submit a certification with regard to drug-free workplace required by 24 CFR part 24, subpart F.

Anti-lobbying. The State must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.

Authority of State. The State must submit a certification that the consolidated plan is authorized under State law and that the State possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan. The State must submit a certification that the housing activities to be undertaken with CDBG, HOME, ESG and HOPWA funds are consistent with the strategic plan.

Acquisition and relocation. The State must submit a certification that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR part 24.

Section 3. The State must submit a certification that it will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.

(b) Community Development Block Grant program. For States that seek funding under CDBG, the following certifications are required:

Citizen participation. A certification that the State is following a detailed citizen participation plan that satisfies the requirements of Sec. 91.115, and that each unit of general local government that is receiving assistance from the State is following a detailed citizen participation plan that satisfies the requirements of Sec. 570.486 of this title. *Also see Appendix D.*

Consultation with local governments.

Community development plan. A certification that this consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the statute authorizing the CDBG program, as described in 24 CFR 570.2, and requirements of this part and 24 CFR part 570.

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Use of funds.

Compliance with anti-discrimination laws. A certification that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Excessive force.

Compliance with laws. A certification that the State will comply with applicable laws.

(c) Emergency Shelter Grant program.

For States that seek funding under the Emergency Shelter Grant program, a certification is required by the State that it will ensure that its State recipients comply with the following criteria:

In the case of assistance involving major rehabilitation or conversion, it will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for not less than a 10-year period;

In the case of assistance involving rehabilitation less than that covered under paragraph (d)(1) of this section, it will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for not less than a three-year period;

In the case of assistance involving essential services (including but not limited to employment, health, drug abuse or education) or maintenance, operation, insurance, utilities and furnishings, it will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure as long as the same general population is served;

Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary;

It will assist homeless individuals in obtaining appropriate supportive services, including permanent housing, medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living, and other Federal, State, local and private assistance available for such individuals;

It will obtain matching amounts required under Sec. 576.71 of this title;

It will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family

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violence shelter project except with the written authorization of the person responsible for the operation of that shelter;

To the maximum extent practicable, it will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining and operating facilities assisted under this program, in providing services assisted under the program, and in providing services for occupants of facilities assisted under the program; and

It is following a current HUD-approved consolidated plan.

(d) HOME program. Each State must provide the following certifications:

If it plans to use program funds for tenant-based rental assistance, a certification that rental-based assistance is an essential element of its consolidated plan.

A certification that it is using and will use HOME funds for eligible activities and costs, as described in Secs. 92.205 through 92.209 of this subtitle and that it is not using and will not use HOME funds for prohibited activities, as described in Sec. 92.214 of this subtitle.

A certification that before committing funds to a project, the State or its recipients will evaluate the project in accordance with guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other federal assistance than is necessary to provide affordable housing.

Housing Opportunities for Persons With AIDS. For States that seek funding under the Housing Opportunities for Persons With AIDS program, a certification is required by the State.

Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Any building or structure purchased, leased, rehabilitated, renovated or converted with assistance under that program shall be operated for not less than 10 years specified in the plan, or for a period of not less than three years in cases involving non-substantial rehabilitation or repair of a building or structure.

(e) HOPWA program. For States that seek funding under the Housing Opportunities for Persons with AIDS program, a certification is required by the State that:

Activities funded under the program will meet the urgent needs that are not being met by available public and private sources; and

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Any building or structure purchased, leased, rehabilitated, renovated, or converted with assistance under that program shall be operated for not less than 10 years specified in the plan, or for a period of not less than three years in cases involving non-substantial rehabilitation or repair of a building or structure.

Sec. 91.330 Monitoring

The consolidated plan must describe the standards and procedures that the State will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including the comprehensive planning requirements.

See Section VI.

Appendix I.

Analysis of Impediments to Fair Housing Choice

Introduction

This State of Indiana Analysis of Impediments to Fair Housing Choice (AI) includes a comprehensive review of policies, practices, and procedures that affect the location, availability, and accessibility of housing and current residential patterns and conditions within the state. The assessment has been conducted in accordance with the requirements outlined for a state-level Analysis of Impediments to Fair Housing (AI) in 24 CFR 570.487(b). The resulting plan was developed with diverse forms of community input with particular emphasis on persons with disabilities and the impediments of access to housing for this population.

It is unlikely that reiterating past statistics will provide an understanding of the difficulties faced by those who have experienced discrimination in housing choice. As such, contained in this document are the stories of those who have endured discrimination in their attempts to exercise their right of housing choice and to secure safe, decent shelter.

The Process. The primary tasks performed during the process included developing a profile of the protected classes; conducting focus groups and a survey; examining public and private real estate development, banking, zoning and tax practices; and analyzing mortgage loan applications and Community Reinvestment Act data.

The citizen participation process included a survey of community leaders, with a section dedicated to fair housing, and six regional sessions with persons with disabilities, advocates and service providers for this group.

Each year the Consolidated Plan Committee seeks to increase involvement of groups that normally are under-represented in the process. This year, persons with disabilities were targeted. Forums were conducted and surveys distributed to determine the status of housing practices, to help identify any existing problems and to assist in the identification of strategies that will promote fair housing practices statewide.

Demographic Profile of the Protected Classes. According to Community 2020 data projections, there was only minimal change in the demographic and geographic profile of members of the protected classes in Indiana. Preliminary Census 2000 data recently released report a significant growth of persons of Hispanic descent in the northeast area of the state (and negligible increases in small cities and towns in southern Indiana). All other indication leads to assumptions that growth in other minority group populations will be limited. Aside from Hispanics, differences in the demographic profile and geographic location of other minorities is predicted to be negligible in the 2000 Census.

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Minority populations make up a very low percentage of total populations in areas outside the state's urban core. Statewide, approximately 83 percent of the block groups are less than 25 percent minority, and 35 percent are less than 1 percent minority. Where Indiana's minority populations are clustered within the state's urban core, the elderly are evenly distributed throughout the state. There are a growing number of persons with HIV/AIDS and disabilities. The percentage of female-headed households is predicted to continue to increase, with a greater number of these households living in poverty.

Minorities are proportionately the largest population living in poverty and unemployed. Elderly households with incomes of less than \$15,000 are dispersed throughout the state, where minorities with incomes of less than \$15,000 cluster around Indiana's major cities.

Public/Private Policies and Practices

Real Estate Practices. In 1995, a random sampling of real estate agents found most were familiar with fair housing as a concept, but other than displaying the fair housing symbol on their literature and occasionally attending a seminar, few were involved in fair housing activities. A 2000 survey revealed similar findings with only a slight increase in agents who participate in more than just an occasional fair housing activity (Keys Group, Interviews 2000).

Barriers to Housing Development. The development and preservation of housing units are essential to the issue of fair housing. In order for residents (in particular the protected classes) to access housing, there must be units to occupy. Thus, development policies, codes, and practices are consequential to the issue of fair housing.

As in the last review, an inspection of state housing and land development ordinances and statutes that relate to development from 1995 to date found that the impact of policies were minimal. The search found nothing critical to restrict development. However, as in the last review, there were tax policies, zoning ordinances, building permits, building codes, and fees that remain as possible impact on the development of certain types of housing units.

Tax Policies. As in 1995, Indiana taxes are assessed on a formula that calculates replacement value of the structure within its use classification. Real estate tax is always subject to legislation; however, single family homes are currently assessed as residential, while multi-family property is assessed as commercial. Commercial rates are higher than residential rates, and condition, depreciation, and neighborhood location are factored into the tax assessment. This assessment process remains a possible barrier to discourage new construction in older, deteriorating neighborhoods. Although renters do not directly pay property taxes, those living in multi family units may have higher costs than those residing in single-family units as a result of landlords passing on their tax bills. As the legislature ponders new taxing policy, any modifications will have to be assessed to consider the impact they will have on the affordability of housing.

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Zoning Ordinances and Land Use Controls. Many areas still require variances or exceptions for the placement of manufactured housing. Therefore, since manufactured housing units are generally more affordable, using this process to enhance the affordable housing stock could be considered a barrier to the construction of these type of affordable units.

Housing Permits. As reported in the housing analysis section of this document, building permits for single family units were issued at a higher rate than multi-family units. An estimated 81 percent of the building permits issued in 2000 were for single-family units. This percentage remains about the same from 1999 and is slightly higher than in 1998 (78 percent). While statewide construction of single family units rose, construction of multi-family units declined. Between 1999 and 2000, the number of permits issued for multi family units decreased by 9 percent. This preference for new single family development could put additional pressure on the rents of multifamily units if they become relatively more scarce.

Reduction in Statewide Affordable Units. The preservation of expiring use Section 8 assisted units has been a recent concern in Indiana. HUD estimates that there are about 30,000 units with expiring contracts in Indiana. However, recent data show that less than 10 percent of the units have opted out of the program. When owners choose to opt out and not provide Section 8 housing, tenants are provided Section 8 vouchers by the local public housing authorities. The requirement of today's opt-out is for a "one for one" replacement of vouchers for previously subsidized units. In other words, if there were 25 units in a property that was opting out, the local housing authority would be provided 25 vouchers for use for affordable housing residents losing their assistance, whether or not all 25 units are occupied. Therefore, in some cases, expiring use properties can create additional subsidized rental units. Additionally, under the Mark to Market program, there have been over 500 units of affordable housing retained in Indiana for an extended use period because of restructuring of the rents, the debt or both, with an additional 500 units currently under process.

Banking Practices

CRA Compliance. The Community Reinvestment Act (CRA) requires that banks progressively seek to enhance community development within the area they serve. On a regular basis, banking institutions submit information about mortgage loan applications as well as materials documenting their community development activity. The records are then reviewed to determine if the bank satisfied CRA requirements. The assessment includes a review of the institutions' records as related to the following:

- Commitment to Evaluating and Serving Community Credit Needs
- Offering and Marketing Various Credit Programs
- Record of Opening and Closing of Offices
- Discrimination and Other Illegal Credit Practices
- Community Development Initiatives

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The data are evaluated, and a rating for each institution is determined. Ratings for institutions range from substantial noncompliance to an outstanding record of meeting community needs. The following table represents CRA Compliance for 1,106 financial institutions in Indiana as of December 2000.

**Exhibit AI-1.
CRA Ratings,
Indiana Financial
Institutions,
December 2000**

Source:
The Keys Group.

Rating	Number of Banks	Percent
Outstanding	193	17.5%
Satisfactory	872	78.8%
Needs Improvement	38	3.4%
Substantial Noncompliance	3	.3%
Total	1,106	100%

CRA Compliance Comparison of States to Indiana – Midwest/Nationwide. As compared to other states in the Midwest, Michigan had the largest percentage of banks rated outstanding in 1995 with 44 percent and remained at the top in percentage in 2000 with 28 percent. However, it should be noted that this total is 12 percent lower than the previous report. In 1995, the percentage of banks in Indiana rated outstanding equaled that of Illinois. In 2000, Indiana remained about the same, while Illinois' percentage dropped by 7 percent. In 1995, Kentucky and Indiana were at the top of the percentage of banks rated satisfactory (77 percent and 76 percent, respectively), and as shown below, they remain at the top of the list with 78.3 percent and 78.8 percent, respectively. This is a 2 percent increase for Indiana and a 1 percent increase for Kentucky. Indiana also experienced a decrease in banks meeting CRA requirements above the satisfactory level.

Forum participants expressed a concern that banks in Indiana meet CRA conditions primarily to comply with regulatory requirements (not because of their commitment to community development). In their opinion, a large number of banks do only what is necessary to receive a satisfactory rating and will not take the additional steps to help the community and become outstanding in terms of their CRA rating.

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Analysis of Impediments to Fair Housing Choice

Exhibit AI-2.
CRA Rating by State, 1995 and 2000

State	Outstanding		Satisfactory		Needs Improvement		Non Compliance	
	1995	2000	1995	2000	1995	2000	1995	2000
Indiana	20.0%	17.5%	76.0%	78.8%	1.6%	3.4%	1.6%	0.3%
Ohio	40.0%	19.3%	57.0%	75.2%	4.5%	5.2%	0.0%	.10%
Illinois	20.0%	12.9%	74.0%	81.5%	5.0%	4.5%	0.5%	0.5%
Kentucky	21.0%	20.1%	77.0%	78.3%	0.0%	1.1%	0.0%	0.2%
Michigan	44.0%	28.1%	54.0%	69.2%	0.0%	2.3%	0.0%	0.2%
Nationwide		17.5%		77.5%		4.2%		0.4%

Source: <http://www.ffiec.gov/cra/>.

A comparison of CRA ratings nationwide finds that Indiana ranks 36th out of 56 states and other jurisdictions in the percentage of banks that are outstanding at meeting CRA criteria, and is above (ranked 24th) the mean of states rated satisfactory or higher in meeting CRA requirements.

Exhibit AI-3.
Indiana's CRA Rankings, 2000

State	Outstanding	Satisfactory	O&S Comb	Needs Improvement	Non Compliance	Needs/Non Compl Combo
Indiana	36 th	16 th	24 th	27 th	20 th	27 th

Source: <http://www.ffiec.gov/cra/>.

HMDA Data Analysis. Housing Mortgage Disclosure Act data for 1999 were reviewed for this analysis. Data were obtained from the Federal Financial Institutions Examination Council (FFIEC) web site (<http://www.ffiec.gov/hmda/>). The information was used to examine statewide loan approval rates for the Indiana market area. The HMDA data consisted of information about mortgage loan applications received by banks, savings and loans, savings banks, credit unions and some mortgage companies. The data contain information about the location, dollar amount and types of loans made, as well as racial and ethnic information and incomes of loan applicants.

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Loan Applications. In 1999, there was a total of 360,238 applications for housing loans initiated in the State of Indiana. Of this total, 6.5 percent were FHA mortgage loans; 25.8 percent were conventional mortgages; 51.6 percent were refinancing; and 11.4 percent were home improvement loan requests.

Exhibit AI-4.
Loan Request by
Application Type

Source:
The Keys Group.

Application Type	Number of Applications	Percent
FHA	23,323	6.5%
Conventional	93,028	25.8%
Refinance	185,735	51.6%
Home Improvement	40,892	11.4%
Other	17,260	4.8%
Total	360,238	100%

Of the loans applied for, approximately 63 percent of housing loans were approved. Twenty-three percent of the applications were denied; 11 percent of the applicants withdrew their applications; and 2 percent of the files were incomplete and subsequently closed. There was a decrease in the percentage of loans approved compared to 1994, from 76 percent to 63 percent, and an increase in number of loans denied, from 16 percent to 23 percent.

Exhibit AI-5.
Loan Request by Application Type and Approval Status

Approval Status	FHA	Conventional	Refinance	Home Improvement	Other	Total	Percent of Total
Loans Originated	19,504	58,492	82,437	20,232	10,122	190,787	53.0%
Approved, Not Accepted	492	6,275	22,221	4,828	1,633	35,449	9.8%
Denied	1,631	20,182	45,731	13,129	3,626	84,299	23.4%
Withdrawn	1,431	6,537	29,232	2,597	1,434	41,231	11.4%
Application Incomplete	265	1,542	6,114	106	445	8,472	2.4%
Loan Applications	23,323	93,028	185,735	40,892	17,260	360,238	100%
Percent of Total	6.5%	25.8%	51.6%	11.4%	4.8%	100%	

Source: The Keys Group.

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The highest approval rate was for loans requesting FHA financing (90 percent of completed applications were approved). Those seeking home improvement loans had the highest denial rate, with 34 percent of completed applications denied.

Exhibit AI-6.
Loan Request by Application Type and Approval Status

Approval Status	FHA		Conventional		Refinance		Home Improvement		Other	
	No.	%	No.	%	No.	%	No.	%	No.	%
Loans Originated	19,504	84%	58,492	63%	82,437	44%	20,232	50%	10,122	59%
Approved, Not Accepted	492	2%	6,275	7%	22,221	17%	4,828	12%	1,633	9%
Denied	1,631	7%	20,182	22%	45,731	25%	13,129	32%	3,626	21%
Withdrawn	1,431	6%	6,537	6%	29,232	11%	2,597	6%	1,434	8%
Application Incomplete	265	1%	1,542	2%	6,114	3%	106	.3%	445	3%
Loan Applications	23,323	100%	93,028	100%	185,735	100%	40,892	100%	17,260	100%

Source: The Keys Group.

Rates by Minority Concentration. An analysis of the loan by minority concentration found there was a total of 16,447 (4.6 percent) loans requested in areas where the minority makeup was 80 to 100 percent of the population; 14,310 (4 percent) in areas where the minority population was 50 to 79 percent minority; 19,237 (5.4 percent) in areas where the population was 25 to 49 percent minority; and 307,030 (86 percent) in areas where the population was less than 24 percent minority.

Exhibit AI-7.
Housing Loans by Type and Percent of Tract/Minority

Percent Minority	FHA	Conventional	Refinance	Home Improvement	Other	Total	Percent of Total
100 to 80 Percent	343	1,765	10,407	2,062	1,870	16,447	4.6%
79 to 50 Percent	728	2,287	8,339	1,750	1,206	14,310	4.0%
49 to 25 Percent	1,476	3,544	10,406	2,266	1,545	19,237	5.4%
24 to 1 Percent	20,728	85,102	154,276	34,239	12,685	307,030	86.0%

Source: The Keys Group.

GRANT REVIEW FIVE

Complete for all agencies applying for the Sexual Assault Services Grant (GREEN SECTION)

Total Points Available 100

	Max	Score
1. Proposal section does not exceed 5 pages (includes the Program and Financial Narrative and the Certification of Local Approval for Nonprofit Organizations)?	5	
2. Program Narrative has the following information:		
- "Needs" to be met & problems to be solved by the project?	15	
- Contains necessary statistics to demonstrate relevant physical, economic, social, financial, institutional or other problems?	25	
- The objective of the activities do tell who is going to do what, when, how much and how it will be measured?	15	
- The Needs Statement outlines the coordination of service of services in the area and agency's involvement in the area's continuum of care?	25	
3. The Financial Narrative form is typed and completed?	5	
4. The evaluation explains how it will be used to improve the program?	10	
Total	100	

COMMENTS: Grant Review Five - Sexual Assault Services Grant (SOS)

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In addition, of the loans requested, approval percentages and percent minority are inversely correlated. This means that the lower the origination rate, the higher the percentage of minorities. This holds true for all categories of loan disposition except “closed for information,” where the difference is relatively insignificant.

Exhibit AI-8.
Housing Loans by Disposition and Percent of Tract/Minority (Percent of Total Applications)

Percent Minority	Originated	Denied	Approved, Not Accepted	Loan Withdrawn	Closed for Information	Total
100 to 80 Percent	32.0%	36.0%	15.0%	14.0%	3.0%	100%
79 to 50 Percent	36.8%	32.9%	13.2%	14.2%	2.9%	100%
49 to 25 Percent	42.0%	30.0%	12.0%	13.0%	3.0%	100%
24 to 1 Percent	55.1%	22.2%	9.3%	11.2%	2.2%	100%

Source: The Keys Group.

Rates by Low Income Concentrations. An analysis of application by median income as a percentage of MSA median was also completed. The income category consisted of census tracts where the median family income was calculated as a percentage of the median income for the MSA. The four classes analyzed of loan application for this analysis included:

- Very low-income category, consisting of census tracts where the median family income is 0 to 30 percent of the median MSA income, based on the 1990 Census.
- Low-income category, consisting of census tracts where the median family income is less than 50 percent of the median MSA income, based on the 1990 Census.
- Moderate-income category, consisting of census tracts where the median family income is at least 50 percent and less than 80 percent of the median MSA income.
- Middle-income category, consisting of census tracts where the median family income is at least 80 percent and less than 100 percent of the median MSA income.

Analysis of loans by income level found a similar trend to that of loans by minority concentration. The higher the percentage of low income, the higher the denial rates and the lower the percentage of applications initiated.

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Exhibit AI-9.
Housing Loans by Type and Percent Low Income

Range	Application Initiated	Application Withdrawn	Denied	Loan Not Accepted	Closed
0% to 30% of Median	47.6%	8.4%	37.4%	12.9%	1.4%
31% to 50% of Median	42.3%	9.0%	33.9%	10.4%	3.4%
51% to 80% of Median	53.7%	9.5%	26.2%	9.2%	2.1%
Over 81% of Median	64.6%	9.6%	18.5%	8.8%	2.6%

Source: The Keys Group.

Approval Rates by Race. It is important to note that, due to limited demographic and location information, a large percentage of the data could not be fully analyzed because information in reference to race and in some cases location was recorded as not available. In addition, loans in areas where the percentage of minorities was less than 25 percent appeared to skew the data sampling. The number of loans that were able to be analyzed totaled 121,000.

The analysis of these loans found that 54 percent of the applicants were Caucasian and 6 percent were minority. (The remainder did not provide information about race.) A further breakdown of minority applicants reveals 6.8 percent were African American, 0.15 percent were Native American, 0.8 percent were Asian, and 1.6 percent were Hispanic.

Exhibit AI-10.
Housing Loan Application Initiated by Race of Applicant

Source:
The Keys Group.

Race	Number of Loans Initiated	Percent of Total
Caucasian	66,190	54.00%
African American	8,260	6.80%
Native American	177	.15%
Asian	968	.80%
Hispanic	1,936	1.60%
Other/Not Provided/NA	43,469	36.00%
Total	121,000	100%

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Race/National Origin. The largest group of minorities applying for residential loans in 1999 (9.4 percent) was African American. A majority (62.5 percent) of these (African American) loans were approved, with 25 percent being denied. Most of the applications were denied based on credit history (71.9 percent) and debt-to-income ratio (12.1 percent).

Asians comprised 0.8 percent of the 121,000 residential loan requests. Asians had the highest (77 percent) approval rating of all minority groups applying for loans. Unlike African Americans, more of their (Asians) loan requests were denied based on their debt-to-income ratio than for credit history.

American Indian/Eskimo/Aleut also comprised a small portion of loan requests. The majority (63 percent) of their loan requests were approved, while only 12.8 percent were denied. Of the 12.8 percent denied, 51 percent were denied based on their credit history.

Hispanics were similar to other minority groups, with 71.6 percent of the loans approved and only 14.3 percent denied. As in other minority groups, loans were denied mainly (48 percent) based on past credit history.

Most of the findings reflected in the analysis of minority applications are consistent with the residential loan requests of Caucasians. Of the 121,000 residential loans requested, 54 percent, or 66,190 were from Caucasians. Similar to minority groups, the majority (83.2 percent) of Caucasians' loan requests were approved, with very few (10 percent) being denied. Caucasians had the highest approval rating of all groups. Caucasians had the same main (48 percent) reason for denial as most minority groups – credit history.

Exhibit AI-11. Housing Loans by Race and Disposition

Race	Loan Initiated	Approved, Not Accepted	Denied	Loan Withdrawn	Closed for Information
Caucasian	81%	2.2%	10.6%	4.2%	3.0%
African American	59%	3.5%	25.0%	9.1%	3.4%
Native American	63%	5.5%	12.8%	12.9%	5.8%
Asian	77%	3.3%	9.2%	8.2%	2.3%
Hispanic	68%	3.6%	14.3%	6.9%	7.2%

Source: The Keys Group.

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Exhibit AI-12.
Housing Loans by Race and Reason for Denial

Reason for Denial	Caucasian	African American	Native American	Asian	Hispanic
Debt-to-Income Ratio	15.0%	12.1%	22.0%	33.0%	19.8%
Employment History	4.9%	6.0%	5.9%	5.1%	9.4%
Credit Information	48.2%	71.9%	51.0%	28.0%	48.0%
Collateral	2.6%	3.8%	2.8%	5.2%	3.1%
Insufficient Cash	3.1%	0.4%	0.9%	2.9%	0.3%
Unverifiable Information	1.1%	0.9%	2.1%	0.8%	2.1%
Credit Application Incomplete	11.3%	2.2%	1.2%	9.0%	3.1%
Mortgage Insurance Denied	.09%	.04%	3.0%	3.0%	8.0%
Other	12.9%	2.3%	11.1%	13.0%	6.2%

Source: The Keys Group.

Of the minority categories, the only outstanding factor is the denial rate for African Americans. African American denial rates were 10 percent higher than other groups. Yet the reason for denial was consistent with other racial groups' credit information. Persons at the forums believed this is the most subjective factor in the loan process and that denial based upon credit is subject to question.

Banking Implications. An analysis of the HMDA data uncovered a modest variation in denial rates of African Americans. The difference is insignificant, however, given the low percentages of initiated loan requests in areas with high concentrations of minorities. Nonetheless, the factors related to denials and loan initiations should be reviewed on a regular basis to determine if a problem exists. There are many reasons that loan approval rates may vary: credit ratings, net worth, and loan to debt ratios play a large role in the decision to deny or approve a loan. Without individual data about the applications analyzed above, it is difficult to assess the presence of discrimination. Disparities in approval rates are not definitive proof of discrimination; rather, the presence of disparities suggests the need for further inquiry. Whatever the effect of the missing data, this analysis found that lending practices need further review. Such a review would also be useful in determining what government sponsored programs might be needed to fill the gaps between what the private market is willing to provide and what is needed.

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Forums and Survey Findings

Community Forums – Persons with Disabilities. Six forums were planned and implemented in the months of February and March. The forums were held in the same cities as the Consolidated Plan forums. In addition, since forums were scheduled two hours prior, participants were encouraged to have lunch and return for the afternoon forums. The goal of the forums was to provide an understanding of fair housing issues, in particular the issues faced by persons with a disabilities.

A great deal was learned from the forums about the difficulties persons with disabilities face in finding housing. The following is a list of the concerns and issues relevant to housing choice as presented by participants.

- There is a lack of knowledge and understanding of what is lawfully considered an accommodation when renting to a person with a disability.
- There was the perception that fair housing laws have no real penalty for persons who violate them, so it was often perceived as easier to not complain and have somewhere to live.
- Housing fair market rents are too low and should be based on smaller geographic areas, where due to the limited supply of units, rents are higher.
- The current debate over group home vs. independent living is a concern. Most believe it is a personal choice and should not be mandated.
- There needs to be more homeownership opportunities for persons with disabilities.
- Persons with disabilities often do not like to have credit and, as a result, have difficulties obtaining mortgage loans.
- Need to require contractors to adhere to standard building design and develop a penalty for those who do not.
- Money to help assist with cost of accommodations is needed.
- Discrimination is prevalent and more testing should be conducted.

Most importantly, forum participants wanted housing providers to be more sensitive to the difficulties they meet while searching for housing that accommodates their needs. In addition, they want all to realize their conditions for housing occupancy are not desires but needs.

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Fair Housing Survey. A survey was distributed to local government officials, community leaders, housing providers, economic development professionals, social service organizations and by the Governor's Council for Persons with Disabilities to their constituents. Respondents were asked to answer a variety of questions pertaining to fair housing in their community. A total of 347 surveys were returned, representing 85 of the 92 counties. The following is a analysis of the findings revealed in a review of the survey. Complete tables from the survey findings are appended to this section.

As the following exhibit reveals, almost 30 percent of survey respondents believed that housing discrimination occurs in their area; however, only 13 percent believe that housing agencies are equipped to handle complaints. In addition, over half of the respondents (60 percent) reported that people know discrimination is prohibited, but 78 percent replied that if discrimination happens most people do not know who to contact. This was surprising given the high percentage (73 percent) of people who maintained there is open access to civil rights offices.

Exhibit AI-13.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Fair Housing Issues	Agree	Other
Zoning laws encourage segregation in housing	19.8%	80.2%
Landlords can limit number of children	26.6%	73.4%
Housing discrimination happens in my area	29.7%	70.3%
People know that discrimination is prohibited	59.7%	40.3%
People know who to contact for discrimination	22.5%	77.5%
Access to civil rights office	72.7%	27.3%
Housing agencies have resources for handling discrimination	13.3%	86.7%

Respondents were asked what they believed the barriers to housing choice were in their community. Overwhelmingly, respondents considered costs of housing (76 percent), public transportation (52 percent) and distance to employment (46 percent) as major barriers, with a small percentage of respondents replying that discrimination (15 percent) was a barrier.

Exhibit AI-14.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Barriers to Housing Choice	Yes	No
Cost of housing	76.1%	23.9%
Access to public transportation	52.2%	47.8%
Housing discrimination	15.7%	84.3%
Lack of Access	32.1%	67.9%
Distance to employment	46.4%	53.6%

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When questioned about what kinds of discrimination they perceived to be a problem, respondents replied family size (30 percent), language (25 percent), disability (23 percent) and race (20 percent).

Exhibit AI-15.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Is the following a Discrimination Issue?	Yes	No
Race	19.8%	80.2%
Age	6.1%	93.9%
Family size	30.7%	69.3%
Gender	3.8%	96.2%
Language	25.3%	74.7%
Disability	23.5%	76.5%

Only a small percent of respondents agreed that loan, insurance and refinancing opportunities in their communities were accessible, reasonable or competitive to persons with lower incomes. Twenty nine percent of the respondents maintained it was easy to obtain home loans from mortgage or financial institutions, 20 percent agreed their communities offered replacement value loans to low income and first time home buyers at reasonable cost and 21 percent responded that low income families were able to refinance their homes at competitive rates.

Exhibit AI-16.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Banking Practices	Agree	Other
Easy to obtain loans from financial institutions and mortgage companies in my community	29.0%	71.0%
Insurance companies offer policies within 100% replacement value to lower-income & first-time homebuyers at reasonable rates	20.0%	80.0%
Lower-income families are able to refinance their homes at competitive interest rates	20.9%	79.1%

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There was a 12 percent increase over the 1995 figure in the proportion of counties and cities that reported passing a fair housing resolution or ordinance. In 2001, 62 percent of the respondents maintained that their area does have a fair housing ordinance, with 70 percent having an affirmative action plan and 76 percent having an equal opportunity ordinance.

Exhibit AI-17.

Source:
2001 Indiana Consolidated Plan
Community Survey.

Category	Yes	No
Passed fair housing ordinance or resolution	62.1%	37.9%
Joined forces to promote fair housing	36.8%	63.2%
Sought impediments to fair housing	32.5%	67.5%
Initiated efforts to further fair housing	34.8%	65.2%
Know of housing complaints filed in past 5 years	3.5%	98.5%

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In addition, just over one-third of the respondents have participated in fair housing efforts and a very small percentage of respondents (3.5 percent) knew of any housing complaint filed in the area in the last five years. Of those reporting they have assisted in furthering fair housing in Indiana, respondents provided the following list of activities they participate in or implement.

Exhibit AI-18.
Fair Housing Activities of Communities Statewide

Board of Realtors, City of South Bend, Lenders, Urban League of St. Joseph County promote an annual Fair Housing & Affordable Homebuying Expo	City has worked very closely with local housing authority on HUD programs and to build homeless shelter
Formed housing partnership (county-wide) with R.D., SIRPC, local realtors, City, CHDOS, et. al., will apply for CPF for housing assessment this year	Knox County commissioners passed a Fair Housing Ordinance & Knox County Housing Authority observes April as Fair Housing Month with HUD
Community task force (not very active)	Member St. Joseph County Housing Consortium
Offered training with housing partnerships; offered training at SU Casa	Member of the Indiana Civil Rights Commission Fair Housing Task Force outreach and education
Fair housing awareness	Developed a committee for housing
Fair housing forum targeted at Hispanics	Redevelopment commission
Starting housing group to discuss issues.	Some work with Habitat
Helped to start continuum of care process; collaborate on crisis housing assistance	Interfaith federation just beginning to address this issue
Homeless coalition	State laws
Housing authority and framework for change are activity promoting and funding affordable housing; several organizations are involved	We have financial assistance programs and sponsor informational meetings and workshops on a variety of issues United Way Activities
Housing fairs, advertising, news, radio, RFPs	We have HUD financing
Housing Grants	HUD Seniors Program
Work actively with HUD, provide housing information in Spanish and English and fair housing seminars	With Greencastle Housing Authority brochures given to every tenant; posters visible at town offices
HUD/ICRC Fair Housing Task Force	Work with churches

Source: 2001 Indiana Consolidated Plan Community Survey.

In response to the question to describe the activities in which they were involved, the following types of activities were given.

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Exhibit AI-19.
Type of Fair Housing Activities

A housing survey was done for the county	Housing Authority, Area 5
Adoption of fair housing ordinance	Housing survey, needs assessment
Recently formed housing partnership to assess and improve housing	In the past worked regionally to establish fair housing board- not active at this time
City HAND department handles	Investigations into alleged discrimination
Commission conducts outreach, assesses complaints filed	Involved on a committee that specifically explored and developed a plan to resolve
Comprehensive economic development planning process	Leadership is by the City of Bloomington and Indiana University
County ordinances and master plan studies	Code enforcement to improve housing quality
Developed a report	Suggestions for consumers
Doing housing study	Task force
Elkhart County Consolidated Housing Plan	Task Forces, forums
Focus groups, surveys	Through human rights commission

Source: 2001 Indiana Consolidated Plan Community Survey.

Voice of the Protected Class. The community input in the development of this analysis was so expressive that this document would not truly represent fair housing in Indiana without the details of the discussions with the forum participants. Thus, this section of stories was developed to present the human side of fair housing issues. Names have been changed to observe confidentiality.

There were four notable situations faced by participants attending the forums planned for persons with disabilities. Each presents a different side to securing affordable, safe housing for persons with disabilities.

Mr. and Mrs. Bryant are a married elderly couple who seek to find suitable housing that will accommodate Mrs. Bryant's special needs. Mrs. Bryant is blind and requires the use of a service animal. She has inquired at housing developments for seniors about residence but has been turned down because animals are not allowed. Until their meeting with the Indiana Civil Rights Commission (ICRC) representative present at the forum, the Bryant's were not aware that refusal to rent to them because of Mrs. Bryant's service animal was in violation of fair housing laws.

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Mr. Pete resides in a home for persons with mental disabilities. Mr. Pete is generally satisfied with his living arrangements but believes if he had the opportunity to move to other accommodations closer to his parents he would. He would like to live in a home similar to the one he lives in now but there are no similar accommodations in the town where his parents live. He likes the group home because he enjoys the fellowship with most of the residents and the activities sponsored. He believes if he could connect with services like those available at the group home he would be amenable to moving. However, in doing so he does not believe he can live alone. If he had his choice, he would like to move into an apartment with his friend but has been told by public housing managers that because they are not related they cannot occupy the same apartment. Until his meeting with an ICRC representative, Mr. Pete was not aware that refusal to allow him to live with an unrelated person to accommodate his special needs was a violation of fair housing laws.

Ms. Hall is a single mom raising three children. She was injured and disabled from a car accident, and is confined to a wheel chair. She believes she was fortunate in that she was disabled in an accident where the insurance company was able to pay a substantial settlement. She now is in the process of building her own home and has been frustrated by a contractor who refused to build her home under the uniform code that accommodates persons with disabilities. She believes it is her right to have her home built according to her specifications, but has had much difficulty finding a contractor who would even consider building her home.

Mr. and Mrs. Jones are a mentally disabled couple who have been married for about three years. When they were married they signed a lease with a company who managed co-op apartment units. Soon after they signed the lease, Mr. Jones began to work two jobs so that they could save to buy a home. It was during this time that several apartment units were broken into, scaring Mrs. Jones. Since Mr. Jones' work schedule left Mrs. Jones at home alone in the evening, the couple inquired about breaking their lease. These inquiries were met with responses from management who refused to provide information about how to break the lease, telling the Jones' that they must find someone else who would rent the apartment before they could move. As Mrs. Jones became more concerned about the accommodations, her mother inquired about the couple moving at the end of their lease, but was also told they needed to find someone to lease the apartment before the couple could move. The apartment complex managers did, however, provide the couple an apartment closer to the front of the complex in an attempt to satisfy Mrs. Jones' fears. The Jones' and Mrs. Jones' mother attended the Consolidated Plan regional forums with the hope that they would receive information on homeownership opportunities for couples with disabilities. After hearing their story, ICRC representatives reviewed

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the lease and found the couple has had the right to move on or after their first year occupancy anniversary by providing the landlord a sixty-day notice. The ICRC representative informed the Jones' they would look into the matter because refusal to recognize the special needs of the couple to explain more clearly their leasing requirements was in violation of fair housing laws.

These stories provide support for an initiative that provides persons with information regarding their rights and responsibilities as they seek to find suitable housing as a tenant or homeowner.

Fair Housing Complaints

Indiana Civil Rights Commission (ICRC) Fair Housing Complaints. The 1996 Analysis of Impediments to Fair Housing referenced the inability to readily determine categorically which complaints to the ICRC were fair housing related. Since this time, ICRC has updated its databases and provided the following data on fair housing complaints filed in the State of Indiana between 1996 and 2000. There were 493 fair housing complaints filed with the commission during this time period. Of that number, 287 of the cases have been closed while the other 206 remain open.

For the 206 open cases, the following table shows the number of currently active cases by year and illustrates when the cases were filed and the disposition of the complaints.

Exhibit AI-20.
ICRC Fair Housing
Complaints Active,
1996-2000

Source:
The Keys Group.

Year Complaint Filed	Number of Complaints	Percent of Total Complaints
1996	12	6%
1997	29	14%
1998	57	28%
1999	78	38%
2000	30	15%
Total	206	100%

In 1996, it was determined that a new complaint database was needed to provide query fields for enhanced investigative capabilities. Since then, complaint data have been entered into a new system. The following tables provide information unattainable when the 1996 report was written. They also provide much information on the type and number of cases filed.

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Exhibit AI-21.
Fair Housing Complaints, Type of Discrimination

Reason for Discrimination	1997		1998		1999	
	Number	Percent	Number	Percent	Number	Percent
Familial Status	20	17.4%	13	11.1%	9	8.3%
Disability	29	25.2%	25	21.4%	33	30.3%
National Origin	6	5.2%	9	7.7%	5	4.6%
Race	52	45.2%	51	43.6%	56	51.4%
Religion	0	0.0%	2	1.7%	0	0.0%
Retaliation	1	0.9%	7	6.0%	3	2.8%
Sex	3	2.6%	7	6.0%	1	0.9%
Sexual Harassment	4	3.5%	3	2.6%	2	1.8%
Total	115	100%	117	100%	109	100%

Source: The Keys Group.

As shown, the first and second most common housing complaints filed in the state were based on race and disability. Between 1997 and 1999, approximately 47 percent of the housing discrimination cases handled by ICRC staff were based on race, and another 26 percent were based on disability. The table above illustrates that these two categories of cases make up more than 75 percent of the housing discrimination complaints in the state.

As the table below illustrates, an average of approximately 34 percent of the cases filed were in non-entitlement areas. This figure has remained steady over the past three years for both entitlement and non entitlement areas.

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Exhibit AI-22.
Fair Housing Complaints, Non- and Entitlement Areas

Category	1997		1998		1999		Total	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Entitlement Areas	75	65%	80	68%	70	64%	225	66%
Non-Entitlement Areas	40	35%	37	32%	39	36%	116	34%
Total	115	100%	117	100%	109	100%	341	100%

Source: The Keys Group

Between 1996 and 2000, ICRC received and filed 493 fair housing complaints. Since ICRC is the agency HUD refers citizens to when seeking to file fair housing discrimination claims, we assume these cases represent the majority of fair housing grievances encountered throughout Indiana. Since the drafting of the 1996 Assessment of Impediments to Fair Housing, ICRC has had notable success in remedying the dilemma of unverifiable case totals. The following are case number highlights as documented using their newly developed database.

- 493 housing discrimination cases were filed with ICRC and only 206 remain open.
- Cases were filed in 48 counties; 24 of these counties do not have entitlement cities within the county.
- 34 percent of the cases were filed in counties that do not have an entitlement city within their boundaries.
- Sex and disability discrimination claims were the top claims of the cases filed.

Of the total cases filed, 116 or 34 percent were housing complaints located in non-entitlement areas. In addition, 75 percent of the cases involved two types of discrimination.

Assessment of Findings

Overview. The analysis of fair housing complaints in the state is very difficult to conduct. Many communities across the state do not have formalized methods for receiving and documenting fair housing complaints. In addition, most Indiana communities do not test for housing discrimination; thus, it was difficult to find verified cases of discrimination. However, when ICRC's new housing discrimination complaint database and public campaign are fully implemented there will be greater

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access to information, a system to track multiple cases of fair housing violations and information on where to file. This will ultimately increase awareness of fair housing regulations in Indiana and provide those in need information about where to go when they have been discriminated against.

Fair Housing Issues

A review of Indiana's policies and programs, the surveys, and regional forums revealed several barriers to furthering fair housing statewide. The following presents an overview of the salient issues impacting fair housing in Indiana.

Education. Many citizens fail to consider fair housing laws as remedies for equal housing access and choice. It was also evident from the research that many citizens remain unfamiliar with fair housing laws. While many residents are aware that housing discrimination exists in their communities, they are unaware of their rights and/or that fair housing grievance procedures are in place in their communities.

Availability. The availability of affordable housing units appears to be decreasing. The pre-existing shortage of these units is evident in the length of the waiting lists public housing agencies have for subsidized units. This is coupled with an affordable housing demand that continues to grow faster than supply, and a deteriorating housing stock.

Affordability. When assessing fair housing concerns in Indiana, affordability must be considered to fully understand the circumstances of low to moderate income persons. The prices of new homes are generally too high for low income populations. Without financial assistance, most of these residents will not become homeowners due to down payment and closing cost requirements. In addition, as expressed during the forums, many renters are in need of assistance to secure decent rental units. Seniors, in particular, are having difficulty paying their rents. Many communities are in need of additional Section 8 vouchers and certificates.

Landlords. Uninformed or willfully unlawful landlords create situations in opposition to fair housing laws. Forum participants expressed concern that landlords often refuse to accommodate persons with disabilities, refusing to allow them the right to occupy the unit with their service animal or another disabled friend.

Lending Practices. Between 1995 and 2000, the percentage of banks in Indiana rated "Outstanding" in meeting CRA requirements declined. The percentage of banks receiving a "Satisfactory" rating increased slightly, as did the percentage of banks with a "Needs Improvement" rating. Participants perceive that banks perform only what is minimally necessary to meet CRA regulations and are not truly interested in the development of communities.

Appendix I.

Analysis of Impediments to Fair Housing Choice

There is also evidence that fewer loan applications are approved in areas with high percentages of minorities. The decline in minority loan applications, coupled with the higher percentage of loans denied to minorities, results in a lower homeownership percentage and a lack of capital for residents to make home improvements, as well as an increased likelihood that the communities affected will decline.

Housing Development. A review of state housing development policies found that 1995 assumptions hold true today. Policies for implementing zoning and taxes are necessary to determine if barriers exist statewide and more incentives are needed to encourage construction of affordable housing statewide.

Assessment of Groups in Place. As reported in the last analysis, it is evident that individuals of the upper and middle income brackets are experiencing the American Dream of housing choice, while large portions of others are not. Also, it is clear that an individual's place is defined by income, as a large number of racial minorities with low incomes are geographically clustered in Indiana's inner cities.

In addition, public transportation that is not routed close to affordable housing can limit a person's ability to access affordable units, as well as employment opportunities. Many areas outlying the urban centers are not serviced by public transit. Consequently, most individuals are limited to housing choices that are accessible via public transportation, as reflected in the number of survey respondents who agreed that access to transportation was a barrier to housing choice.

Organizing Around Fair Housing Issues. Few Indiana communities are prepared to handle fair housing issues. Many Indiana residents are aware that housing discrimination does exist in their communities. However, this analysis and the voice of the people support the opinion that the number of documented complaints does not accurately reflect the level of discrimination throughout Indiana. The Indiana Civil Rights Commission, with support from agencies represented by the Consolidated Plan Committee, is working to alleviate these problems.

Statewide Impediments

Identified Impediments. Considering these fair housing issues, the following list of impediments to fair housing was developed. As in 1995, most of the impediments listed below are linked to the need to define and educate citizens about fair housing regulations. However, there were many impediments associated with accommodations for persons with disabilities.

Appendix I.

Analysis of Impediments to Fair Housing Choice

- Uninformed or intentionally unlawful landlords make easy prey of the disabled and prohibit them from equal access to housing.
- The limited supply of decent housing in areas where low/moderate minority income and large families are confined prevents these residents from accessing adequate housing.
- The age of homes in many of the areas where large families and low/moderate income minority householders reside can make it difficult to economically rehabilitate and modernize these units. This may result in few decent and safe units in areas where large numbers of the protected classes reside.
- Because universal designs are not regularly used to construct rental units, more accommodations are needed for persons with disabilities.
- Many privately subsidized developers, contractors and architects ignore required accessibility design standards when constructing multi-family dwellings.
- Unreported and perpetual discrimination sets a precedent that housing discriminatory activity is acceptable.
- The lack of public transportation outside of Indiana's larger cities prevents individuals from seeking housing and employment choices outside these areas.
- Incentives to develop affordable housing in all areas of the state are not in place.
- Many jurisdictions' regulations requiring variances to build manufactured housing cause additional burdens for those wanting to use this method to increase affordable housing opportunities.
- The limited supply of decent affordable units and Section 8 vouchers, coupled with long waiting lists for public housing units, limits low income and moderate income households from securing quality units.

Accomplishments by Action Task, 2000-2001

With the support of a multi-agency team, the state has been able to make strides toward furthering fair housing in Indiana. The Indiana Fair Housing Task Force, along with Indiana Department of Commerce, the Indiana Housing Finance Authority, the Indiana Family and Service Administration, and the Indiana Civil Rights Commission have greatly expanded the state's coordination of activities and campaign to resolve fair housing issues. A complete list of fair housing activities appears in each agency's Consolidated Annual Performance Evaluation Report (CAPER). The following is a summary of the progress made toward the goals presented in the 2000 Action Plan.

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Analysis of Impediments to Fair Housing Choice

Exhibit AI-23.
Action Plan Accomplishments, 2000-2001

A. Action Task – Establish of a statewide verification and documentation process for complaints	Activities
<p>Goal To develop a strategy for the networking of statewide agency fair housing complaints with ICRC.</p> <p>Output Measures Completion of strategy to network the complaint database with other agencies.</p>	<ul style="list-style-type: none"> ■ ICRC continues to make progress in data entry of complaint information to prepare for the community sharing and processing of statewide data. ■ ICRC is attempting to hire a person who will develop a strategy for the networking of complaint information with other agencies.
B. Action Task – Continue to monitor the progress of equal access to housing in the state	Activities
<p>Goal To enhance the Statewide Fair Housing Committee efforts throughout Indiana</p> <p>Output Measures Increase non-entitlement area representatives on the Indiana Fair Housing Task Force by 10 percent.</p>	<p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> ■ Targeted representatives from non-entitlement communities and under represented segments of the housing industry to become members of the task force <p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> ■ Networked with other enforcement agencies to increase fair housing presence within the state and the Fair Housing Task Force membership
<p>Goal To update the Assessment of Impediments to Fair Housing and establish a process for continuous review of fair housing issues.</p> <p>Output Measures Completion of draft of the Analysis of Impediments and an approved update process</p>	<p>Consolidated Plan Coordinating Committee and Indiana Fair Housing Task Force Representatives</p> <ul style="list-style-type: none"> ■ Developed strategy to have the <i>Analysis of Impediments to Fair Housing</i> drafted ■ Developed process to update and evaluate action tasks proposed in the plan ■ Planned and implemented annual review process for the purpose of discussing fair housing progress <p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> ■ Develop strategy to update fair housing data collection and assessment of findings annually

Appendix I.

Analysis of Impediments to Fair Housing Choice

Exhibit AI-23. (continued)
Action Plan Accomplishments, 2000-2001

C. Action Task – Continue to improve fair housing intra/inter agency coordination of activities	Activities
<p>Goal To improve fair housing coordination statewide with particular emphasis on non-entitlement areas</p> <p>Output Measures The development of a comprehensive Consolidated Plan document that includes the Analysis of Impediments to Fair Housing data and analysis</p> <p>Increase non entitlement area representation on the Indiana Fair Housing Task Force by 10% and increase distribution of fair housing information throughout the system</p>	<p>IDOC, IHFA, FFSA, ISDH and ICRC</p> <ul style="list-style-type: none"> Continue to partner with Indiana Fair Housing Task Force and provide leadership and financial and human resources for the implementation of task force activities. <p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> Provided the Consolidated Plan Coordinating Committee updates of their activities and continue to have representation on the committee. <p>Consolidated Plan Coordinating Committee</p> <ul style="list-style-type: none"> Worked more closely with representatives from the Task Force to ensure coordination of activities and to provide financial and human support when needed
D. Action Task – Develop methods to seek out violators of fair housing regulations	Activities
<p>Goal To enhance the tester program</p> <p>Output Measures The development of a strategy for the permanent funding of the tester program Computerization of tester program files</p> <p>Goal To increase the number of testers and tests statewide</p> <p>Output Measures Calculation of baseline of tester and tests to be used to increase the number of testers and tests in Indiana by 2 percent and 5 percent yearly.</p>	<p>Indiana Civil Rights Commission</p> <ul style="list-style-type: none"> Worked with the Indiana Fair Housing Task Force to develop a proposal for funding of the tester program Researched funding alternatives for the tester program Conduct tester training in two non-entitlement areas Received FHIP Grant to fund tester & other programs <p>Indiana Civil Rights Commission</p> <ul style="list-style-type: none"> Continue to develop a computer based test program Evaluation is on hold until program is developed <p>Indiana Civil Rights Commission</p> <ul style="list-style-type: none"> Calculated number of testers and tests in FY2000 to determine a baseline of activity. Testers and testing program recruitment on hold until coordinator is hired.

Appendix I.

Analysis of Impediments to Fair Housing Choice

Exhibit AI-23. (continued)
Action Plan Accomplishments, 2000-2001

E. Action Task – Continue Education Programmatic Thrust	Activities
<p>Goal</p> <p>To continue to enhance Fair Housing Month as a major emphasis in the education of Indiana residents on the rights and requirements of fair housing</p> <p>Output Measures</p> <p>Increase non-entitlement number of activities and publicity notifications of events by 10 percent and that of participants residing in non-entitlement areas by 5 percent</p> <p>Increase support of the Fair Housing Summit by soliciting an increased number of scholarships</p> <p>Goal</p> <p>To continue to enhance understanding of fair housing throughout Indiana</p> <p>Output Measures</p> <p>Annual Fair Housing Summit hosted in a non-entitlement city</p> <p>Increase the number of county/city representative who can provide training/workshops to agencies, realtors and housing stakeholders in the field</p> <p>Increase the number of contracts and workshops presently conducted outside of entitlement areas by 20 percent</p>	<p>Indiana Fair Housing Task Force (continue last year's program as outlined below)</p> <ul style="list-style-type: none"> ■ Governor: Provided a proclamation recognizing fair housing month and its activities ■ Lt. Governor: Promoted the Annual Fair Housing Summit in his weekly column ■ Task Force: Announced and circulated Summit information throughout the state with emphasis on distribution of information in non-entitlement cities ■ Considered offering scholarship opportunities for Fair Housing Summit to be completed in future ■ Lowered registration fee to encourage more participation ■ Housing Summit organizers offer legal continuing education credit this year ■ For those who are unable to attend the Summit for longer than a day conference, it was shortened to one day <p>Indiana Fair Housing Task Force</p> <ul style="list-style-type: none"> ■ Hosting of the annual Fair Housing Summit in a non-entitlement city was not effective; smaller conference planned <p>Indiana Housing Finance Authority</p> <ul style="list-style-type: none"> ■ Continued to require that each grantee take action to further fair housing that reaches the entire community and not just residents of the IHFA-funded projects or low income residents when conducting fair housing activities

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Analysis of Impediments to Fair Housing Choice

Exhibit AI-23. (continued)
Action Plan Accomplishments, 2000-2001

E. Action Task – Continue Education Programmatic Thrust	Activities
	<p>Indiana Housing Finance Authority</p> <ul style="list-style-type: none"> Continued to require communities that have fair housing ordinance in place to take some other action to affirmatively further fair housing. <p>Indiana Civil Rights Commission</p> <ul style="list-style-type: none"> Continued to target non-entitlement areas for distribution of brochures and location of workshops Continued to distribute the Indiana Civil Rights Commission's brochure, "You May Be a Victim," to residents by IHFA grantees through affordability period.
	<p>Indiana Civil Rights Commission and IHFA</p> <ul style="list-style-type: none"> Continued to update program brochures to reach all populations including providing information in multi-lingual, Braille and large print formats.
	<p>Indiana Housing Finance Authority</p> <ul style="list-style-type: none"> Continued to host their Annual Affordable Housing Conference where a session on fair housing will be presented.
	<p>Indiana Civil Rights Commission and IHFA</p> <ul style="list-style-type: none"> Continued to provide technical assistance, and presentations on fair housing as well as partner with providers to present fair housing training.
	<p>Indiana Department of Commerce</p> <ul style="list-style-type: none"> Continued to lists task force and fair housing activities in the <i>Grant Management Quarterly</i>.

Source: 2001 Indiana Consolidated Plan Community Survey.

In addition, IHFA supported Task Force activities by providing funds to coordinate and implement programs to further fair housing from their HOME allocation. ICRC also applied for and received FHIP funds as additional support for these activities.

Appendix I.

Analysis of Impediments to Fair Housing Choice

Exhibit AI-24.
Fair Housing Action Plan, 2001-2005

Goal/Task	01	02	03	04	Responsible
Goal: To explore avenues to incorporate the uniform federal accessibility standards into local/state building codes					
Task: Research and develop position paper on the benefits of uniform accessibility standards in construction of multi family housing statewide	■	■			Task Force & Coordinator
Task: Circulate position paper on the benefits of uniform accessibility standards in construction of multi family housing to advocates for comments		■	■		Task Force & Coordinator
Goal: To complete the networking of fair housing complaints to civil rights commissions with ICRC's database.					
Task: Develop strategy for networking of complaint database with other agencies	■	■			ICRC
Task: Complete networking of ICRC housing complaint database	■	■			ICRC
Goal: To enhance Fair Housing Task Force efforts statewide					
Task: Continue to encourage and appoint members from non entitlement cities to serve on the Fair Housing Task Force	■	■	■	■	Task Force & Coordinator
Task: Continue to network with other enforcement agencies to increase Fair Housing Task Force membership statewide	■	■			Task Force & Coordinator
Task: Continue to network with other enforcement agencies to increase fair housing presence statewide	■	■			Task Force & Coordinator
Goal: To continue to monitor progress of equal access to housing statewide					
Task: To provide ongoing information on accomplishments and progress made to further fair housing statewide	■	■	■	■	Task Force & Coordinator
Task: To monitor potential impact on equal access to housing	■	■	■	■	Task Force & Coordinator
Goal: To improve fair housing coordination within the state with particular emphasis on non-entitlement areas					
Task: IDOC, IHFA, FSSA and ICRC continued participation on the Indiana Fair Housing Task Force	■	■	■	■	IDOC, IHFA, FSSA and ICRC
Task: IDOC, IHFA, FSSA and ICRC continue to provide leadership and financial and human resources for the implementation of task force activities	■	■	■	■	IDOC, IHFA, FSSA and ICRC
Task: Continue to work closely with the Fair Housing Task Force to coordinate activities and the drafting of the Consolidated Plan	■	■	■	■	Consolidated Planning Committee

Appendix I.

Analysis of Impediments to Fair Housing Choice

Exhibit AI-24. (continued)
Fair Housing Action Plan, 2001-2005

Goal/Task	01	02	03	04	Responsible
Goal: To enhance the testing program and increase the number of testers and statewide					
Task: Increase pool of testers statewide	■	■	■	■	Task Force & Coordinator
Task: Develop process to computerize tester program	■	■			Task Force & Coordinator
Task: Conduct tester training	■	■			Task Force & Coordinator
Task: Continue to increase testing statewide	■	■	■	■	Task Force & Coordinator
Goal: To continue to enhance understanding of fair housing statewide					
Task: Target landlords and builders and educate them on fair housing laws and accommodation requirements for persons with disabilities	■	■	■	■	Task Force & ICRC
Task: Host meetings in small cities and town administrator sessions to educate them on fair housing laws and accommodation requirements for persons with disabilities	■	■	■	■	Task Force & ICRC
Goal: To continue to enhance fair housing month as a major emphasis in the education of Indiana residents on the rights and requirements of fair housing					
Task: Increase support of the Fair Housing Summit by soliciting more scholarships sponsors	■	■	■	■	Task Force & Coordinator
Task: Increase the number of non-entitlement activities and publicity/ notification of events	■	■	■	■	Task Force & Coordinator
Task: Governor to provide proclamation recognizing fair housing month and its activities	■	■	■	■	Task Force & Coordinator
Task: Promotion of Fair Housing Month by Governor, Lt Governor and Task Force through proclamation, feature column , and media	■	■	■	■	Task Force, Coordinator, Governor and Lt Governor
Task: Implementation and promotion of small cities and towns fair housing workshops statewide	■	■	■	■	Task Force & Coordinator

Appendix I.

Analysis of Impediments to Fair Housing Choice

Monitoring Plan

For managerial purposes, the monitoring of the fair housing initiatives outlined in this document will be the administrative responsibility of the Indiana Department of Commerce, Department of Grants Management, in conjunction with the Indiana Fair Housing Task Force and members of the Consolidated Plan Coordinating Committee. The Indiana Department of Commerce will continue to partner with the Indiana Civil Rights Commission, the Indiana Housing and Finance Authority, the Indiana Family and Social Services Administration, and the Indiana State Department of Health to promote fair housing. Under the leadership and direction of the above groups, the responsibility to review and evaluate fair housing initiatives within the state will be included in the responsibilities of the Fair Housing Assessment Committee. This team has a responsibility, with approval of the fair housing partners, to complete the following.

- Drafting of an Updated Analysis of Impediments to Fair Housing;
- Updating of records related to fair housing initiatives throughout the state;
- Tracking the efforts and program accomplishments of fair housing initiatives within the state;
- Preparing a report of the accomplishments and monitoring efforts; and
- Maintaining and facilitating the assessment of CRA and HMDA data.

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Analysis of Impediments to Fair Housing Choice

Exhibit AI-25. Fair Housing Survey Question Tables

"Zoning laws in my community (e.g., growth boundaries, minimum lot sizes) encourage segregated housing."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	20	6.8	7.8	7.8
Agree	38	13.0	14.8	22.6
Neither Agree Nor Disagree	97	33.1	37.7	60.3
Disagree	48	16.4	18.7	79.0
Strongly Disagree	54	18.4	21.0	100
Total	257	87.7	100	

"Minorities, large families, and persons with disabilities can obtain desirable housing in any area of my community."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	28	9.6	10.3	10.3
Agree	55	18.8	20.3	30.6
Neither Agree Nor Disagree	58	19.8	21.4	52.0
Disagree	66	22.5	24.4	76.4
Strongly Disagree	64	21.8	23.6	100
Total	271	92.5	100	

"Landlords in my community can limit the number of children living in an apartment."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	23	7.8	9.3	9.3
Agree	55	18.8	22.3	31.6
Neither Agree Nor Disagree	114	38.9	46.2	77.7
Disagree	28	9.6	11.3	89.1
Strongly Disagree	27	9.2	10.9	100
Total	247	84.3	100	

"It is easy to obtain loans from financial institutions and mortgage companies in my community."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	12	4.1	4.5	4.5
Agree	65	22.2	24.6	29.2
Neither Agree Nor Disagree	104	35.5	39.4	68.6
Disagree	49	16.7	18.6	87.1
Strongly Disagree	34	11.6	12.9	100
Total	264	90.1	100	

"Insurance companies offer policies within 100% replacement value to lower income and first time home buyers at reasonable rates."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	8	2.7	3.3	3.3
Agree	40	13.7	16.7	20.0
Neither Agree Nor Disagree	135	46.1	56.3	76.3
Disagree	38	13.0	15.8	92.1
Strongly Disagree	19	6.5	7.9	100
Total	240	81.9	100	

Appendix I.

Analysis of Impediments to Fair Housing Choice

Exhibit AI-25. (continued)
Fair Housing Survey Question Tables

"Lower income families are able to refinance their homes at competitive interest rates."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	7	2.4	2.9	2.9
Agree	44	15.0	18.0	20.9
Neither Agree Nor Disagree	112	38.2	45.9	66.8
Disagree	63	21.5	25.8	92.6
Strongly Disagree	18	6.1	7.4	100
Total	244	83.3	100	

"Housing discrimination happens in my community."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	23	7.8	8.7	8.7
Agree	64	21.8	24.3	33.1
Neither Agree Nor Disagree	96	32.8	36.5	69.6
Disagree	55	18.8	20.9	90.5
Strongly Disagree	25	8.5	9.5	100
Total	263	89.8	100	

"The people in my community know that discrimination is prohibited in the sale and rental of housing, mortgage lending and advertising."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	48	16.4	18.1	18.1
Agree	127	43.3	47.9	66.0
Neither Agree Nor Disagree	63	21.5	23.8	89.8
Disagree	20	6.8	7.5	97.4
Strongly Disagree	7	2.4	2.6	100
Total	265	90.4	100	

"The people in my community know whom to contact when facing housing discrimination."

	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	13	4.4	5.1	5.1
Agree	53	18.1	20.6	25.7
Neither Agree Nor Disagree	87	29.7	33.9	59.5
Disagree	73	24.9	28.4	87.9
Strongly Disagree	31	10.6	12.1	100
Total	257	87.7	100	

"The housing enforcement agency in my community has sufficient resources to handle to amount of discrimination that may occur."

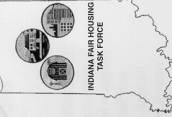
	Frequency	Percent	Valid Percent	Cumulative Percent
Strongly Agree	9	3.1	3.7	3.7
Agree	30	10.2	12.3	16.0
Neither Agree Nor Disagree	116	39.6	47.7	63.8
Disagree	56	19.1	23.0	86.8
Strongly Disagree	32	10.9	13.2	100
Total	243	82.9	100	

Appendix I.

Analysis of Impediments to Fair Housing Choice

Exhibit AI-26.

The Fourth Annual Fair Housing Summit Brochure



THE
INDIANA
FAIR HOUSING
TASK FORCE
presents

THE FOURTH ANNUAL
FAIR HOUSING SUMMIT

FAIR HOUSING:
THE AMERICAN
DREAM

THURSDAY, APRIL 26, 2001

Community & Education Center
M. S. D. of Washington Township
8550 Woodfield Crossing Boulevard
Indianapolis, Indiana 46240

INDIANA FAIR HOUSING TASK FORCE

c/o INDIANA CIVIL RIGHTS COMMISSION
100 N. SENATE AVENUE, ROOM N103
INDIANAPOLIS, IN 46204-2211

AN EQUAL OPPORTUNITY EMPLOYER

Individually cannot be registered but services can be registered.
Dr. Martin Luther King, Jr.

HURRY!
Limited Booth Space
Only \$75

INDIANA FAIR HOUSING TASK FORCE

HOTEL ACCOMMODATIONS

Registrants are responsible for their hotel reservations. Rooms are limited and reservations must be made early. Rooms are not guaranteed after deadline date. Please reserve early and state that you are attending the Fourth Annual Indiana Fair Housing Task Force (IFHTF) Summit to qualify for special rate. Free parking and near the Keystone at the Crossing Fashion Mall.

SHERATON INDIANAPOLIS HOTEL & SUITES
8787 Keystone Crossing
Indianapolis, Indiana 46240

Hotel rooms are limited - Please register early
Hotel Registration Deadline: March 26, 2001

REGISTRATION FEE - \$60.00

Prepaid registration cancellations received ten (10) business days prior to the Summit will be refunded less a \$25.00 administrative fee. Early registration is advised. Substitutions may be made at any time. Names of persons substituting for confirmed registrants must be submitted to the IFHTF no later than 10 business days prior to the Summit. Please complete the registration form and mail with your payment.

MAIL TO: INDIANA CIVIL RIGHTS COMMISSION
ATTN: JACQUELYN SCHMIDT
100 North Senate Avenue, Room N103
Indianapolis, Indiana 46204

FAX TO: (317) 232-6580 TELE: (317) 232-2643

PLEASE PRINT FORM FOR EACH REGISTRANT
METHOD OF PAYMENT ENCLOSED:

____ Check ____ Purchase Order ____ Billing

Name: _____

Organization: _____

Address: _____

City/State/Zip: _____

Tele/FAX: _____

Do You Require Special Accommodation: (please describe) _____

Please Indicate Special Dietary Needs: _____

APPENDIX I
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE
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Appendix I.

Analysis of Impediments to Fair Housing Choice

Exhibit AI-26. (continued)
The Fourth Annual Fair Housing Summit Brochure

INDIANA FAIR HOUSING TASK FORCE

The **INDIANA FAIR HOUSING TASK FORCE** promotes equal housing opportunity for all people in Indiana through cooperative efforts with federal, state and local government, Indiana businesses, social service organizations, and fair housing advocacy groups.

The goal of the task force is to educate housing providers, consumers, fair housing advocacy organizations and government leaders on their rights and responsibilities in ensuring free housing choice to every Indiana resident.

TASK FORCE MEMBERS

INDIANA STATE DEPARTMENT OF HEALTH
METROPOLITAN INDIANAPOLIS BOARD OF REALTORS
INDIANA CIVIL RIGHTS COMMISSION
GREATER INDIANAPOLIS NAACP BRANCH
SOUTHERN INDIANA REHABILITATION
AREA AGENCY ON AGING
INDIANA RECREATION DIVISION
FEDERAL HOME LOAN BANK
RURAL OPPORTUNITIES
BUILDERS ASSOCIATION OF GREATER INDIANAPOLIS
GOVERNOR'S PLANNING COUNCIL
U. S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT
INDIANAPOLIS NEIGHBORHOOD HOUSING PARTNERSHIP
INDIANA HOUSING FINANCE AUTHORITY
INDIANA BANKERS ASSOCIATION
INDIANAPOLIS COMMUNITY ACTION AGAINST POVERTY
BANC ONE
LEGAL SERVICES ORGANIZATION
INDIANA COALITION ON HOMELESS & HOUSING ISSUES
MICHIGAN CITY HOUSING AUTHORITY
SOCIETY BANK
BLOOMINGTON CHAMBER OF COMMERCE
INDIANA FARM CREDIT BANK
INDIANA DEPARTMENT OF COMMERCE
INDIANA DEPARTMENT OF REVENUE
INDIANA MORTGAGE BANKERS
APARTMENT ASSOCIATION OF INDIANA
AFRICAN COMMUNITY INTERNATIONAL CENTER
WELLS FARGO FINANCIAL
UNITED SENIOR ACTION
INDIANAPOLIS URBAN LEAGUE
INDIANAPOLIS HOUSING AGENCY
THE SPANISH CONNECTION

THE FAIR HOUSING SUMMIT

The **FOURTH ANNUAL INDIANA FAIR HOUSING SUMMIT** has been developed to educate a wide range of businesses and organizations involved in the housing industry. Each session is informative to the city planner, apartment manager, realtor, builder, as well as to the fair housing advocate and enforcement specialist. The Summit topics include:

- The impact of housing discrimination on its victims;
- Affordable new construction and modification for accessibility by people with disabilities;
- Discrimination issues in homeowners insurance and mortgage lending; and many more.

FAIR HOUSING: LIVING THE AMERICAN DREAM

WORKSHOP SUMMARIES

Discriminatory Practices in Homeowners Insurance:
Learn how insurance underwriting policies can discriminate and underinsure in violation of federal and state fair housing laws.

Accommodating People with Disabilities:
Learn about your legal obligations to provide accessibility for the disabled.

Fair Housing Laws:
A fair housing expert to discuss updates and trends.

Interactive Discussion on Housing:
Panel on local, state, and federal resources.

Advertising Blunders:
Learn responsible advertising.

Discrimination in Mortgage Lending:
Learn how apparently neutral mortgage lending policies can violate federal and state fair housing laws.

INDIANA FAIR HOUSING TASK FORCE

The goal of the task force is to educate housing providers, consumers, fair housing advocacy organizations and government leaders on their rights and responsibilities in ensuring free housing choice to every Indiana resident.

TASK FORCE MEMBERS

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INDIANA CIVIL RIGHTS COMMISSION
GREATER INDIANAPOLIS NAACP BRANCH
SOUTHERN INDIANA REHABILITATION
AREA AGENCY ON AGING
INDIANA RECREATION DIVISION
FEDERAL HOME LOAN BANK
RURAL OPPORTUNITIES
BUILDERS ASSOCIATION OF GREATER INDIANAPOLIS
GOVERNOR'S PLANNING COUNCIL
U. S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT
INDIANAPOLIS NEIGHBORHOOD HOUSING PARTNERSHIP
INDIANA HOUSING FINANCE AUTHORITY
INDIANA BANKERS ASSOCIATION
INDIANAPOLIS COMMUNITY ACTION AGAINST POVERTY
BANC ONE
LEGAL SERVICES ORGANIZATION
INDIANA COALITION ON HOMELESS & HOUSING ISSUES
MICHIGAN CITY HOUSING AUTHORITY
SOCIETY BANK
BLOOMINGTON CHAMBER OF COMMERCE
INDIANA FARM CREDIT BANK
INDIANA DEPARTMENT OF COMMERCE
INDIANA DEPARTMENT OF REVENUE
INDIANA MORTGAGE BANKERS
APARTMENT ASSOCIATION OF INDIANA
AFRICAN COMMUNITY INTERNATIONAL CENTER
WELLS FARGO FINANCIAL
UNITED SENIOR ACTION
INDIANAPOLIS URBAN LEAGUE
INDIANAPOLIS HOUSING AGENCY
THE SPANISH CONNECTION

WORKSHOP SUMMARIES cont

Establishing a Fair Housing Ordinance:
Learn how to create and implement an ordinance for your community.

Real Estate Best Practices:
Learn how realtors can avoid unintentional pitfalls of housing discrimination.

AGENDA

THURSDAY, APRIL 26, 2001

8:00 - 12:00 Registration
8:00 - 8:45 Continental Breakfast
9:00 - 10:30 Plenary Session:
Fair Housing: Many Faces, Many Dreams

10:30 - 10:45 BREAK
10:45 - 12:00 Simultaneous Workshops I
1. Discriminatory Practices in Homeowners Insurance
2. Accommodating People with Disabilities
3. Fair Housing Laws *
4. Interactive Discussion on Fair Housing

12:00 - 1:30 LUNCHEON
1:30 - 3:00 Simultaneous Workshops II
1. Advertising Blunders
2. Discrimination in Mortgage Lending
3. Establishing a Fair Housing Ordinance
4. Real Estate Best Practices

3:00 - 3:15 BREAK
3:15 - 5:00 Closing Plenary Session
New Roads Traveled: A panel to discuss multi-family concerns and affordable housing issues pertaining to a growing and diverse Indiana population

Attendees will receive the **Indiana Civil Rights Commission Certificate of Fair Housing Education**

* **CLE Certification Pending**

WORKSHOP SUMMARIES

Discriminatory Practices in Homeowners Insurance:
Learn how insurance underwriting policies can discriminate and underinsure in violation of federal and state fair housing laws.

Accommodating People with Disabilities:
Learn about your legal obligations to provide accessibility for the disabled.

Fair Housing Laws:
A fair housing expert to discuss updates and trends.

Interactive Discussion on Housing:
Panel on local, state, and federal resources.

Advertising Blunders:
Learn responsible advertising.

Discrimination in Mortgage Lending:
Learn how apparently neutral mortgage lending policies can violate federal and state fair housing laws.